

Attachment O

**Closure Cost Estimate Description
8/10/92**

Attachment O

Closure Cost Estimate Description

The Closure Cost Estimate (CCE) provided in this attachment is a revised version to the one included in RSI's Closure Plan. This CCE is provided to outline in greater detail the costs RSI anticipated for closure of the Marcus Hook facility, after the Facility had been operated to full capacity. This facility has obviously not been operated in any significant capacity with respect to volume or risk of waste release, and thus, would not presently require the implementation of all the activities or costs outlined in the Closure Plan and this cost estimate. Additionally, this estimate includes present valuation for the financial assurance RSI has in place for the Facility. The following are funds currently available for closure of the Marcus Hook facility, as of July 24, 1992:

:

:

Bank	Amount
Northern Trust Bank, Chicago, Illinois	\$ 1121.05
LaSalle National Bank, Chicago, Illinois	\$ 1022.50
Total	\$ 2143.55

Funding requirements:

Item	Due	Calculation	Amount
Initial pay in:	9/25/90	1/20 of \$ 20,000	\$ 1000.00
First annual payment	9/25/91	1/19 of \$ 19,726.31 ⁽¹⁾	\$ 1038.31
Total			\$ 2038.31
Excess			\$ 105.24

NOTES: (1) Based on Closure Cost Estimate adjusted for inflation.

Attachment O

RSI Closure Cost Estimate Marcus Hook Facility

Item	Estimated Cost
1. Treatment and/or disposal of hazardous waste present at the Facility at the time of closure	
• On-site treatment of hazardous waste inventory	--(1)
• Analysis, transportation, and disposal of clean solids, and any untreated wastes	\$ 5,000
2. Collection of ground samples, 8 soil samples, 1 back-ground sample, 2 duplicate samples, 1 equipment blanks, and 1 travel blank by an independent environmental consultant, removal of 15' x 15' security fence:	
• Staff professional (8 hours @ \$50/hour)	\$ 400
• Project manager (8 hours @ \$75/hour)	\$ 600
• Skilled labor (20 hours @ \$20/hour)	\$ 400
• Supplies and equipment	\$ 600
3. Laboratory analysis for leachable (TCLP) and total concentrations of selected volatile and semi-volatile organic compounds:	
• 12 samples ⁽²⁾ @ \$500/sample	\$ 6,000
4. Additional analysis if required	
• 6 samples @ \$500/sample	\$ 3,000
5. Independent, professional engineer for closure certification	
• (20 hours @ \$100/hour)	\$ 2,000
6. Miscellaneous cost allowance	
• (@ 10%)	\$ 2,000
6. TOTAL ESTIMATED COST	\$ 20,000
7. Inflation Adjustment ⁽³⁾	
• 1991 - effective July 24, 1991	\$ 20,726.31
• 1992 - effective July 24, 1992	\$ 21,045.17

- NOTES:
- (1) Because RSI is a commercial hazardous waste treatment Facility, treatment of the hazardous waste present at the Facility at the time of closure, as well as disposal of clean solids, will be paid for (on a per-ton basis) by the generator of that waste (i.e., RSI's customer).
 - (2) Analytical laboratory does not charge for analysis of the travel blank.
 - (3) The closure cost estimate is adjusted for inflation annually using the most recent Implicit Price Deflator for the Gross National Product published by the U.S. Department of Commerce in its "Survey of Current Business."

Region III, Region V, Region IX, OWPE

- Wayne Roepe

TO: File

RSI
PAD987283439

Due June 27
mail file
begin at 10:00
EPA by due
date.

June 27, 1990 Notification (rec'd July 17, 1990)
Sept 22, 1990 Part A (rec'd September 25, 1990)

Feb 22, 1991 Interim status letter

July 10, 1991 phone conversation with Jim Davis PADER:
→ Operated MTU in Sept. 1990.
→ no documentation (rec'd info by phone)
→ PADER waste management unaware, but BAQ may be
→ Drums were in a fenced area.

July 19, 1991 Letter from Compliance Services Inc. to Bill Stueteville. PADER inspector, Jim Davis, was at the site prior to January 16. He told them to remove the 12 drums to remain in compliance with the less than 90 days storage.
→ 6 55-gallon drums contaminated soil (D018)
→ 5 drums cooling water from process-non RCRA
→ 1 treated soil - non RCRA

On January 16 Bill gave an agreement to allow the removal of drums if RSI agreed to analyze wastes, provide transportation and disposal documentation, etc. Bill also requested to be onsite during pickup.

November 1991 Site Visit Hon. Lee, Paul Gotthold, Barbara Okorn

April 2, 1992 3007 letter

April 10, 1992 conversation with Mark Bruchett, RSI. Not coming back to PA.

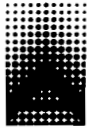
April 15, 1992 Phone conversation with Bill. RSI is aware they are PRP. Not required to do anything yet. Drums were moved without his permission.

April 17, 1992 Letter requesting to withdraw interim status

May 29, 1992 Letter concerning closure funds.

June 22, 1992 Phone conversation with Mark Bruchett:
Drums received September 15, 1990 from Ultronic. No treatment except September 16 or 17, 1990. Contents see above. Drums shipped to Michigan on October 4, 1991.

3007
letter
etc.



RECYCLING SCIENCES INTERNATIONAL, INC.

An Environmental Restoration Company

30 South Wacker Drive, Suite 1420

Chicago, Illinois 60606

(312) 559-0122

*BARB
lets talk
to Tim*

April 17, 1992

Mr. Paul Gotthold (3HW51)
U.S. EPA
Region III
841 Chestnut Building
Philadelphia, PA 19107

RECEIVED
PA SECTION

APR 21 1992

Dear Mr. Gotthold:

Pursuant to the conversation I had with Ms. Barbara Okorn on April 15th, I am writing this letter to withdraw Recycling Sciences' interim status claim on the 210 East Tenth Street Marcus Hook, PA, property (PA987283439).

RSI treated TC material at this site with our mobile process on September 15, 1990 with the hope of being able to develop the property into an on going operation. RSI has not treated any material on this property since the submittal of our Part A application, and we have no intention of doing so in the future. Material that was stored on the site has been removed as well with all the necessary documentation in order.

Please advise as to how you wish to proceed on this matter.

Sincerely,

Mark Burchett
Executive Vice President



RECYCLING SCIENCES INTERNATIONAL, INC.

An Environmental Restoration Company

30 South Wacker Drive, Suite 1420

Chicago, Illinois 60606



CHICAGO IL 60607 04/20/92 21:12 #11

Mr. Paul Gotthold (3HW51)
U. S. EPA
Region III
841 Chestnut Building
Philadelphia, PA 19107

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Recycling Sciences, Inc.

DATE: 4-10-92

FROM: Barbara ^{Paul Gotthold}Okorn, Environmental Scientist
PA/DC Permits Section

TO: Paul Gotthold, Chief
PA/DC Permits Section

The following issues were discussed in a telephone conversation between Barbara Okorn and Mark Bruchet, Recycling Sciences, Inc. (RSI), on April 10, 1992. This conversation was the result of an EPA 3007 letter dated April 2, 1992.

Mr. Bruchet stated that RSI has no intention of using the PA site again. He then explained RSI's history. According to Mr. Bruchet, RSI met with EPA HQ in 1990, to discuss the possibility of using a mobile treatment unit at various sites prior to the TCLP effective date (September 25, 1990). This was to establish a track record at the site in order to gain interim status. According to Mr. Bruchet, HQ informed RSI in writing that although this wasn't the best way to gain interim status, RSI could do it as long as they complied with all applicable regulations.

RSI treated a small quantity of TC wastes in Arizona, Michigan, Mississippi, and Pennsylvania prior to September 25, 1990. RSI was at the PA site on September 16 or 17, 1990. They received all appropriate air permits. RSI left several drums on-site, in late fall or winter of 1990, to maintain storage at the facility. The drums were in a fenced area with containment. All drums have been removed from the site.

RSI intended to buy the property from FMC, but found that it was contaminated. The area is now part of a Superfund site. For this reason, RSI has no intention of continuing the use of the PA site. RSI realizes that they must close the site, although "there is nothing there".

Mr. Bruchet is currently gathering the response to EPA's April 2, 1992 letter.

*Paul → forget response + send
withdrawal letter. Talk to S.F.*

*add this to Mr. Bruchet 4/15/92 - sending
to Paul*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

APR 2 1992

Mr. Anthony Novelli
Director of Compliance Services
Recycling Sciences International, Inc.
30 South Wacker Drive
Suite 1420
Chicago, IL 60606

Re: Recycling Sciences Center (PAD987283439)
210 East 10th Street, Marcus Hook, PA 19061

Dear Mr. Novelli:

Pursuant to the enforcement authority granted to the U.S. Environmental Protection Agency ("EPA") under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927 (a), which provides in relevant part that "any person who generates, treats, stores, transports, disposes of, or otherwise handles or has handled hazardous waste shall, upon request of any officer, employee, or representative of the Environmental Protection Agency, duly designated by the Administrator, ...furnish information relating to such wastes..." (emphasis added), EPA hereby requests that you furnish to EPA within thirty (30) calendar days of receipt of this letter, the information requested below.

In responding to this information request, you should base your answers on information and documents in your possession or reasonably available to you. If you cannot answer any question in its entirety, answer as much of the question as you can with the resources available to you. Where information necessary for complete response is neither in your possession nor reasonably available to you, indicate this fact in your response, and identify the document(s) which you expect would contain the necessary information and any source that either possesses or is likely to possess such information.

Please provide a separate narrative response to each question. Precede each answer with the number of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession relating to the matters described below.

"Document" shall mean writings (handwritten, typed, or otherwise produced or reproduced) and includes, but is not

limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entries, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

QUESTIONS

With respect to the Recycling Sciences Center facility located at 210 East Tenth Street, Marcus Hook, PA (the "Facility"), please submit the following information:

1. Provide a detailed description of the operations actually conducted at the Facility, including:
 - a. the date(s) of operation,
 - b. the source, amount and nature of any materials processed at the Facility,
 - c. the processes used at the Facility,
 - d. any waste streams generated as a result of operations at the Facility, including the manner in which such streams are treated, stored, disposed of, or otherwise managed.
2. Identify any and all federal, state and local permits or approvals obtained or applied for with respect to operations conducted or expected to be conducted at the Facility. With respect to each such permit or approval, provide the following:
 - a. the date of application,
 - b. copies of the permit application or request for approval, and
 - c. copies of any correspondence between you and any regulatory or governmental authority regarding or referring to the permit or approval.
3. Provide copies of any hazardous waste manifests, invoices, or other shipping documents received by the Facility with respect to materials received at the Facility for processing.
4. Provide copies of any hazardous waste manifests and any notifications and/or certifications required under 40 CFR § 268.7 prepared by the Facility with respect to materials generated at the Facility.

5. Provide copies of any waste analysis or other chemical or physical analyses conducted by or on behalf of the Facility or any other person with respect to any materials received for processing and any waste streams generated at the Facility.
6. Identify those portions of the Facility, if any, currently constructed and, for each portion, provide the dates construction was started and was completed.
7. Identify those portions of the Facility, if any, with respect to which construction is not yet completed, and, for each portion, provide the dates or expected dates of the start-up and completion of construction. Provide copies of any documents evidencing any contractual obligations entered into by the Facility for physical construction at the Facility.
8. Provide a copy of the written waste analysis plan for the Facility required under 40 CFR § 265.13(b).
9. Provide a copy of the written inspection schedule for the Facility required under 40 CFR § 265.15(b).
10. Provide copies of the personnel and training documents maintained at the Facility as required by 40 CFR § 265.16(d).
11. Identify whether the Facility is equipped with the equipment described in 40 CFR § 265.32, and, with respect to any equipment not in place, explain why such equipment is not required.
12. Provide a description of the arrangements and agreements made with state and local authorities with respect to the Facility in accordance with 40 CFR § 265.37.
13. Provide copies of the Facility's Contingency Plan, Operating Record, and Closure Plan as required under 40 CFR Sections 265.51, 265.73, and 265.112, respectively.
14. Provide a description of the assumptions made in calculating the cost estimate for the closure of the Facility.
15. Provide a copy of any tank assessment performed with respect to tanks used for the storage or treatment of hazardous waste at the Facility as required under § 265.192(a).

The provisions of Section 3008 of RCRA, 42 U.S.C. Section 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false,

fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

You are entitled to assert a claim of business confidentiality covering any part or all of the information, in a manner described in 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time requested information is submitted, EPA may make this information available to the public without further notice to you.

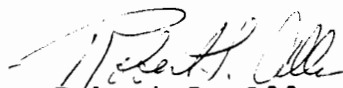
This collection of information requested is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. Sections 3501-3520.

Please send the requested information to:

U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, PA 19107
Attn: Barbara Okorn (3HW51)

If you have any questions concerning this matter, please contact Ms. Barbara Okorn at (215) 597-8116.

Sincerely,



Robert L. Allen, Chief
RCRA Programs Branch

PS Form 3800, June 1985

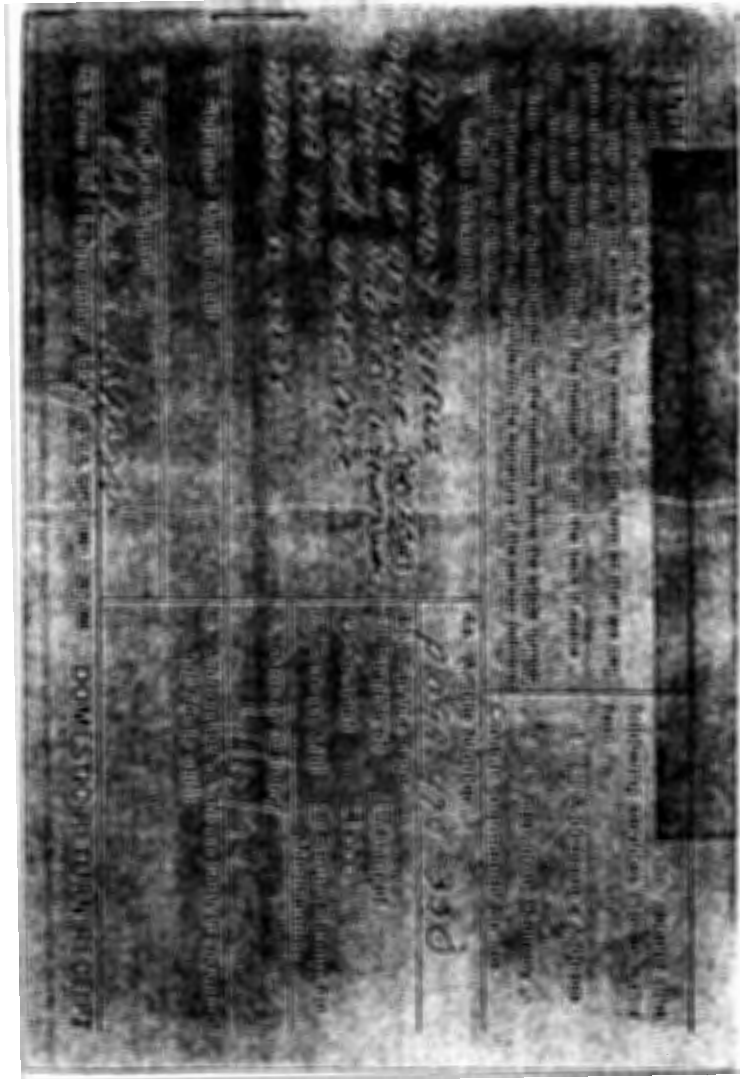
3007 *Letter*

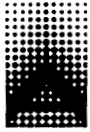
P 097 470 350

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to <i>MR ANTHONY NOVELL</i>	
<i>RECYCLING SERVICES</i>	
Street and No. <i>30 South Wacker Drive</i>	
P.O., State and ZIP Code <i>CHICAGO IL 60606</i>	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date	





RECYCLING SCIENCES INTERNATIONAL, INC.

An Environmental Restoration Company
30 South Wacker Drive, Suite 1420
Chicago, Illinois 60606
(312) 559-0122

February 27, 1992

Mr. Thomas C. Voltaggio, Director
Hazardous Waste Mgmt Div(3HW00)
U.S. EPA Region III
841 Chestnut Street
Philadelphia, PA 19107

Re: Recycling Sciences Ctr, PAD987283439

Dear Mr. Voltaggio:

In order to transfer closure funds from the Northern Trust Bank to the LaSalle National Trust N.A. under the Trust Agreement dated February 21, 1992 between Recycling Sciences International, Inc. and LaSalle National Trust N.A.(copy enclosed), please sign the Statement of Release as the beneficiary of the letter of credit from Northern Trust and return the release directly to the Northern Trust.

We have directed the Northern Trust to transfer the balance in the letter of credit to the closure fund at LaSalle National Trust N.A. escrow account 62-6925-309.

Please be advised that additional closure funds of \$6,135.00 are on deposit at LaSalle National Trust N.A. in escrow account #62-6925-30-9.

Best Regards,

Cornelius M. Ryan
Chief Financial Officer

enclosure: Closure Trust Fund



RECYCLING SCIENCES INTERNATIONAL, INC.

An Environmental Restoration Company
30 South Wacker Drive, Suite 1420
Chicago, Illinois 60606
(312) 559-0122

Bob Allen

May 29, 1992

Via: Certified Mail

Mr. Thomas C. Voltaggio, Director
Hazardous Waste Mgmt Div(3HW00)
U.S. EPA Region III
841 Chestnut Street
Philadelphia, PA 19107

Re: Recycling Sciences Ctr, EPA ID# PAD987283439

Dear Mr. Voltaggio:

On February 27, 1992 your office was sent a notification that Recycling Sciences International, Inc's closure funds were being transferred from the Northern Trust Bank to the LaSalle National Trust N.A. under a Trust Agreement dated February 21, 1992 between RSI and LaSalle National Trust N.A..

To date, Northern Trust has not received your signed Statement of Release as the beneficiary of the letter of credit from Northern Trust. We are enclosing a copy of the information previously sent to you and are further requesting that you sign and return the Statement of Release directly to the Northern Trust.

These funds can be transferred to the LaSalle National Trust only after the Northern Trust has received your Statement of Release.

Please be advised that additional closure funds of \$6,135.00 are on deposit at LaSalle National Trust N.A. in escrow account #62-6925-30-9.

Best Regards,

Cornelius M. Ryan

Cornelius M. Ryan
Chief Financial Officer

enclosure: Closure Trust Fund
2-27-92 letter

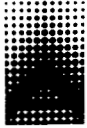
DATE:

Mrs. Veronica M. Loza
Personal Banking Officer
Northern Trust Company
125 S. Wacker Drive
Chicago, IL 60606

Re: Letter of Credit - Recycling Sciences International

Dear Mrs. Loza,

This letter is to notify you that we release our beneficial interests in Northern Trust Bank Letter of Credit #5242457 dated 10/03/91. This Letter of Credit was for for Recycling Sciences International.



RECYCLING SCIENCES INTERNATIONAL, INC.

An Environmental Restoration Company

30 South Wacker Drive, Suite 1420

Chicago, Illinois 60606

(312) 559-0122

For Allen



February 27, 1992

Mr. Thomas C. Voltaggio, Director
Hazardous Waste Mgmt Div (3HW00)
U.S. EPA Region III
841 Chestnut Street
Philadelphia, PA 19107

Re: Recycling Sciences Center, PAD987283439

Dear Mr. Voltaggio:

In order to transfer closure funds from the Northern Trust Bank to the LaSalle National Trust N.A. under the Trust Agreement dated February 21, 1992 between Recycling Sciences International, Inc. and LaSalle National Trust N.A. (copy enclosed), please sign the Statement of Release as the beneficiary of the letter of credit from Northern Trust and return the release directly to the Northern Trust.

We have directed the Northern Trust to transfer the balance in the letter of credit to the closure fund at LaSalle National Trust N.A. escrow account 62-6925-309.

Please be advised that additional closure funds of \$6,135.00 are on deposit at LaSalle National Trust N.A. in escrow account #62-6925-30-9.

Best Regards,

Cornelius M. Ryan

Cornelius M. Ryan
Chief Financial Officer

enclosure: Closure Trust Fund

DATE:

Mrs. Veronica M. Loza
Personal Banking Officer
Northern Trust Company
125 S. Wacker Drive
Chicago, IL 60606

RE: Letter of Credit - Recycling Sciences International

Dear Mrs. Loza,

This letter is to notify you that we release our beneficial interest in Northern Trust Bank Letter of Credit #5242457 dated 10/03/91. This Letter of Credit was for Recycling Sciences International.

Mark,

This should be on
their letterhead & signed
including title of person
who signed it.

Ronnie

559-1154

Trust Agreement

Trust Agreement, the "Agreement", entered into as of February 21, 1992, by and between Recycling Sciences International, Inc., a Delaware corporation, the "Grantor", and LaSalle National Trust N.A., the "Trustee".

Whereas, the United States Environmental Protection Agency, "EPA", an agency of the United States Government, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility shall provide assurance that funds will be available when needed for closure and/or post-closure care of the facility.

Whereas, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein.

Whereas, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this Agreement, and the Trustee is willing to act as trustee.

Now, therefore, the Grantor and the Trustee agree as follows:

Section 1. Definitions As used in this Agreement:

(a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.

(b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified on attached Schedule A.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund", for the benefit of EPA. The Grantor and the Trustee intend that no third party have access to the Fund except as herein

provided. The Fund is established initially as consisting of the property, which is acceptable to the Trustee, described in Schedule B attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by EPA.

Section 4. Payment for Closure and Post-Closure Care. The Trustee shall make payments from the Fund as the EPA Regional Administrator shall direct, in writing, to provide for the payment of the costs of closure and/or post-closure care of the facilities covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the EPA Regional Administrator from the Fund for closure and post-closure expenditures in such amounts as the EPA Regional Administrator shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the EPA Regional Administrator specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the

interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that:

(i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80a-2.(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State government;

(ii) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State government; and

(iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

(a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and

(b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

(a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;

(b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted:

(c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

(d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and

(e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of

the Trustee shall be paid from the Fund.

Section 10. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the appropriate EPA Regional Administrator a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the EPA Regional Administrator shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of the Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation. The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of

the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the EPA Regional Administrator, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 14. Instructions to the Trustee. All orders, requests, and instruction by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the EPA Regional Administrator to the Trustee shall be in writing, signed by the EPA Regional Administrators of the Regions in which the facilities are located, or their designees, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or EPA hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or EPA, except as provided for herein.

Section 15. Notice of Non-Payment. The Trustee shall notify the Grantor and the appropriate EPA Regional Administrator, by certified mail within 10 days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed, the Trustee shall not be required to send a notice of nonpayment.

Section 16. Amendment of Agreement. This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the appropriate EPA Regional Administrator, or by the Trustee and the appropriate EPA Regional Administrator if the Grantor ceases to exist.

Section 17. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the EPA Regional Administrator, or by the Trustee and the EPA Regional Administrator, if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

Section 18. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the EPA Regional Administrator issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

Section 19. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the State of ~~(refer to Attachment A)~~. *Delaware.*

Section 20. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

IN WITNESS whereof, the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written: The parties below certify that the wording of this Agreement is identical to the wording specified in 40 CFR 264.151(a)(1) as such regulations were constituted on the date first above written.

RECYCLING SCIENCES INTERNATIONAL, INC.

BY: Mark Danaher

Title: Executive Vice President

(Bank Name)

BY: J. Kit Silver

Title: ASSISTANT VICE PRESIDENT

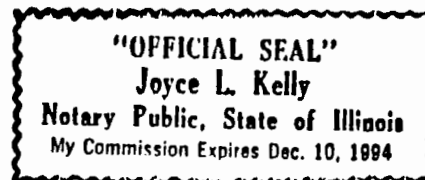
State of IL

County of: COOK

On this 21st day of Feb 1992, before me personally came MARK BURCHETT, to me known, who, being by me duly sworn, did depose and say that she/he resides at 10505 GOLF RD. ORLAND PK IL, that she/he is EXECUTIVE VICE-PRESIDENT of Recycling Sciences International, Inc., the corporation described in and which executed the above instrument; that she/he knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed by order of the Board of Directors of said corporation, and that she/he signed his/her name thereto by like order.

Joyce L. Kelly
Notary Public

My Term of Office Expires 12-10-94



Attachment A

Recycling Sciences International, Inc. Facilities Listing

Following is a list of RSI facilities for which financial assurance is demonstrated by the attached Closure Trust Fund. This attachment meets requirements outlined in 40 CFR 264.151 (a), Section 2 of the trust agreement. RSI's use of this trust fund for the facilities listed below demonstrates compliance with standards outlined in 40 CFR 265.143 (g), and more generally in 40 CFR 265.143 (a).

Facility Location	Closure Cost Estimate
Recycling Sciences Center EPA ID# AZD982429805 16255 W. Avra Valley Highway Marana, AZ 85653	\$60,000.00
Recycling Sciences Center EPA ID# MID985582329 4935 Hannan Rd. Wayne, MI 48184	\$20,000.00
Recycling Sciences Center EPA ID# MSD985968619 2373 Artesia Rd. Columbus, MS 39701	\$20,000.00
Recycling Sciences Center EPA ID# PAD987283439 210 E. 10th St. Marcus Hook, PA 19061	\$20,000.00
Total Combined Closure Costs	\$120,000.00

Schedule 'B'

RECYCLING SCIENCES INTERNATIONAL, INC.
Northern Trust
Certificates of Deposit

L of C #	Certificate #	Location	Due Date	Amt
S242458	2127977	Wayne, MI	9-24-92	\$1,000.00
			Interest*	\$76.05
S242457	2127975	Marcus Hook, PA	9-24-92	\$1,000.00
			Interest*	\$76.05
S242456	2127976	Starkville, MS	9-24-92	\$1,000.00
			Interest*	\$76.05
S242455	2127974	Marana, AZ	9-24-92	\$3,000.00
			Interest*	\$228.16
Total LC=				\$6000.00
Total Interest*=				\$456.31
Total on Deposit				\$6456.31

*Interest amounts are accrued as of 9-24-91

Exhibit A
RSI Designees:

Thomas P. Dunne
Chief Executive Officer

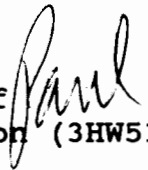
Mark Burchett
Executive Vice President

Cornelius M. Ryan
Chief Financial Officer

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Interim Status of Recycling
Sciences, Inc.
PAD987283439

DATE: 12-31-91

FROM: Paul Gotthold, Chief 
PA/DC Permits Section (3HW51)

TO: Mary Coe, Chief
PA and Maryland Section (3RC32)

Enclosed is further information concerning Recycling Sciences, Inc. as per our meeting of December 10, 1991. The letters and memos are correspondence between other EPA regions and RSI.

We really need to move on this, Mary, so can we get an answer by January 15?

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: TCLP and the Existence of New Facilities

DATE MAY 21 1991

FROM: Paul Gotthold, Chief
PA/DC Permits Section (3HW51)

TO: Larry Falkin, Chief
State Enforcement Section (3HW62)

The following new facilities tentatively qualify for interim status as a result of the TCLP rule:

Recycling Sciences Center PAD987283439
Tier Inc. PAD987285137
RS Engineering (no ID number yet)

Copies of the Part A Applications are attached.

As you know, interim status requires both a timely notification/Part A and an "existing" facility. Since TCLP is not a state authorized issue, we request that you investigate the "existence" of the facilities. There have been several "existence" problems in other regions concerning Recycling Sciences Center.

We appreciate your attention in this matter.



COMPLIANCE
SERVICES, INC

AN ENVIRONMENTAL MANAGEMENT COMPANY

*Barb -
Hold until
we hear
from Mary.*

July 19, 1991

Mr. Bill Steuteville
U.S. EPA Region III
3HW33
841 Chestnut Street
Philadelphia, PA 19107

Dear Mr. Steuteville:

Rich Trimpi and myself spoke with you back on January 16, 1991 concerning 12 drums of waste materials on the Marcus Hook site. These drums are the result of a test operation of thermal extraction equipment by The Sullivan Group (currently referred to as Recycling Sciences International, Inc. / RSI). Shortly prior to January 16 Jim Davis of the Norristown, PA office of PA DER saw the drums on site and requested they be removed to stay in compliance with the ninety day storage requirements. After Jim contacted RSI, and we were informed of his request, we called you to discuss the options for removal.

Since that time we have been in negotiation with RSI as to who would dispose of these wastes and how, and who would pay for disposal, etc. Recently we resolved the issues between RSI and ourselves and completed the steps necessary to be in a position to remove the drums from the site.

The twelve drums on site break down as follows:

1. 6 55 gallon drums of gasoline contaminated soil - D018
2. 5 55 gallon drums of cooling waters - non RCRA hazardous
3. 1 55 gallon drum of treated soil - non RCRA hazardous

We requested approval to remove these drums from the site without going through the superfund protocols. Because this waste was generated from a process outside the one which contaminated the site we felt EPA would agree to remove the drums outside the superfund program.

On January 16th you did give a conditional agreement to allow us to remove the drums from the site if we provided you with certain information first. The information you requested was:

1. Analysis of the wastes
2. Waste disposal profiles for proposed facilities.
3. Permit packages for each facility.
4. Permit package for the transporter.
5. A narrative explaining that PADER had requested removal of the materials to comply with 90 day requirements.

You also stated that copies of all shipping documents would have to be forwarded to your office after shipment. In addition, you requested to be on site during pick up of the waste materials.

Items one through four are enclosed. All wastes are currently approved for disposal and upon notification by your office we will arrange a pick up date.

Please review the enclosed information and call me at 215 254 0842 or 215 495 0824 to discuss this project further.

Sincerely,

COMPLIANCE SERVICES, Inc.



Andy Meadows
Disposal Services Manager, CHMM

JOHN PFROMMER, INC. HW NUMBERS

Census No. 113583

STATE	IDENTIFICATION NO.	EXPIRATION
ALABAMA	PAD008781072	12-23-92
ARKANSAS POLLUTION	H397 (PC-1083 (Vans)	06-24-92
ARKANSAS STATE	H397	06-01-92
ARIZONA	NONE REQUIRED OTHER THAN EPA NO.	
CALIFORNIA	2035 (Need inspection) Vans T251 and 252	11-30-91
COLORADO	HMP00543 (Vans)	08-18-91
CONNECTICUT	CT HW 273	06-30-95
DELAWARE	OH168	04-30-92
DIST. COLUMBIA	NONE REQUIRED OTHER THAN EPA NO.	
FLORIDA	INSURANCE CERTIFICATE REQUIRED	
FLORIDA	BROWARD COUNTY (Vans Only)	10-29-91
GEORGIA	5064 (1 Permit) Kept in office	12-30-91
IDAHO	560870 (Tractors Limited)	12-31-91
ILLINOIS	SWH 1871	11-30-91
INDIANA	NONE REQUIRED	
IOWA	NONE REQUIRED OTHER THAN EPA NO.	
KANSAS	PAD008781072	02-28-92
KENTUCKY	PAD008781072	no expiration
LOUISIANA	ONLY GENERATORS AND DISPOSERS MUST REGISTER	
MARYLAND	HWH350	12-31-91
MASSACHUSETTS	295 Vans only	12-31-91
MICHIGAN	BUSINESS PAD008781072	10-31-91
MINNESOTA	55186 (Vans)	05-23-91
MISSISSIPPI	NONE REQUIRED OTHER THAN EPA NO.	
MISSOURI	H1635 Vans only)	09-04-91
NEBRASKA	NONE RREQUIRED OTHER THAN EPA NO.	
NEW HAMPSHIRE	TNH-0080 (vans only)	06-30-94
NEW JERSEY	HW 58610	09-30-91
NEW JERSEY	SOLID 16811	04-30-92
NEW MEXICO	NONE REQUIRED OTHER THAN EPA NO.	
NEW YORK	PA082	12-31-91
NEVADA	10059 (Need temp fuel permits	12-31-91
NEVADA	PCB ID N. NVT-PCB-037	no expiration
NEVADA	CLARK COUNTY	06-10-91
NORTH DAKOTA	HW204 (Limited to rollins (vans only)	06-12-91
OHIO	472HW Hazardous waste	No expiration
OHIO	HAZRDIOUS MATERIALS	12-31-91
OKLAHOMA	3425 (Vans Only)	02-28-92
PENNSYLVANIA	AH0042 (hazardous waste)	07-31-92
PENNSYLVANIA	PA-HC-0022 (Infectious) (vans Only)	10-31-91
RHODE ISLAND	R1576 (Varies per trailer	various
SOUTH CAROLINA	PAD008781072	09-22-91
SOUTH DAKOTA	NONE REQUIRED OTHER THAN EPA NO.	
TENNESSEE	PAD008781072	03-01-92
TEXAS	THWR/TDH Solid No. 40768	No expiration
UTAH	NONE REQUIRED OTHER THAN EPA NO.	
VIRGINIA	PAD008781072 6	10-11-92
WISCONSIN	11627	09-30-91
WEST VIRGINIA	NONE REQUIRED OTHER THAN EPA NO.	
WYOMING	NONE RQUIRED OTHER THAN EPA NO.	
VERMONT	LIMITED TRACTOR AND TRAILER (Vans)	06-30-91
QUEBEC	QC-6ML-028	03-15-94
* MICHIGAN	527 (Liquid)	02-28-92

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
WASTE MANAGEMENT DIVISION



Page 1 of 5

ACT

HAZARDOUS WASTE TRANSPORTER
BUSINESS LICENSE

64

Issued under the authority of Act 64, P.A. 1979, as amended. Failure to comply with the provisions of this Act may result in revocation or denial of license.

EPA I.D. No.: PAD 008781072Date Issued: November 1, 1990Date Expires: October 31, 1991

In compliance with the provisions of the Michigan Hazardous Waste Management Act (Act 64, P.A. 1979, as amended) hereinafter referred to as "the Act",

Name: John Pfrommer, Inc.Address: 360 Ben Franklin Hwy.Douglasville, PA 19518Business Telephone: 215-385-3051Emergency Telephone: 215-385-7052

is authorized to transport hazardous waste in the vehicles described below in accordance with the provisions of R 299.9401 to R 299.9412 of the Michigan Administrative Code and the "Special Conditions" in this license.

SPECIAL AUTHORIZATIONS

1. Licensee is/is not authorized to mix, combine, and commingle hazardous waste. R 299.9405.
2. Licensee is/is not authorized to operate a transfer facility. R 299.9404.

The above identified licensee shall:

1. Ensure that each vehicle used to transport hazardous waste is licensed under the Act prior to transporting any hazardous waste.
2. Carry a copy of the business license in each vehicle used to transport hazardous waste.
3. Continuously maintain financial capability as defined by R 299.9711.
4. Accept loads of hazardous waste only if offered for transport with an appropriate manifest form completed by the hazardous waste generator.
5. Deliver the hazardous waste and accompanying manifest only to the destination specified by the generator on the manifest.
6. Abide by all of the provisions and conditions of hazardous waste transporter vehicle licenses used by the licensee.
7. The licensee shall not store any hazardous waste unless authorized under the provisions of R 299.9404 as a transfer facility. Hazardous waste located anywhere other than a licensed vehicle is considered storage.

APPLICATION SHALL BE SUBMITTED SIXTY (60) DAYS BEFORE EXPIRATION OF THIS LICENSE. THIS LICENSE IS NOT TRANSFERABLE.

David Hales, Director

Approved By: Waste Management Division

CITY ENVIRONMENTAL, INC. - WASTE WATER TREATMENT FACILITY is a non-hazardous industrial liquid waste treatment facility located at 1923 Frederick Street; Detroit, Michigan. The site is near the intersection of Interstate Highways 75 and 94, providing convenient access for many waste generators and transporters.

CEI-Frederick accepts a variety of chemical and oily wastewaters. A confidential pre-acceptance program ensures all waste streams meet the non-hazardous requirements of Michigan Act 136, as well as compatibility with design technology. The process includes sample submittal and waste characterization.

Approved incoming wastewaters are quickly off-loaded at any of three (3) areas, which include screening and grinding capabilities. The unloading sites are paved and provide ample space for vehicles up to tanker-trailer size. These features reduce expensive idle and downtime for delivery trucks. Holding capacity at the facility is 750,000 gallons.

Wastewaters are treated by batch process in three 17,000 gallon capacity tanks, resulting in economical and complete treatment. Influent is chemically pH adjusted and mixed with polymers to provide solids precipitation. The supernatant is then discharged to the municipal sewage system. Watery sludges are conditioned and cycled through a 35 cubic foot, 2,000 gallon per hour high pressure plate and frame filter press. Filtrate from the press is recycled for treatment and sludge cakes are disposed at City Sand and Landfill Inc., a licensed Type-II facility.

CEI-Frederick has the capability and expertise to meet your non-hazardous liquid disposal requirements. A technical and customer service staff are ready to assist you by providing the services that will result in the most economical treatment of waste streams.

CITY ENVIRONMENTAL, INC. - SOLIDIFICATION FACILITY is a non-hazardous industrial liquid solidification conditioning facility located at 1550 Harper; Detroit, Michigan. The site is near the intersection of Interstate Highways 75 and 94, providing convenient access for many waste generators and transporters.

CEI-Harper accepts both bulk and drummed liquids, sludges, slurries, and solids. A confidential pre-acceptance program ensures that all waste streams meet both United States E.P.A. and the Michigan Department of Natural Resources requirements for non-hazardous waste material. The process includes sample submittal and waste characterization.

Approved, incoming wastes are quickly off-loaded at one of three (3) areas. These areas include a drum-handling pad, a 30,000 gallon holding tank, and a 80,000 gallon recessed receiving tank. The variety of off-loading areas is designed to reduce expensive idle and downtime for delivery trucks.

All bulk waste materials accepted at **CEI-Harper** are solidified in a Pug Mill and disposed of at CITY SAND and LANDFILL, INC. ("CSL"), a licensed Type II facility. Drummed waste is removed, solidified, the drums crushed, and disposed of at CSL.

CEI-Harper has the capability and expertise to meet your non-hazardous liquid, slurries, and sludge disposal requirements. A technical and customer service staff are ready to assist you by providing services resulting in the most economical treatment of waste streams.



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MI054683479

REACKNOWLEDGEMENT

CITY DISPOSAL SYSTEMS INC
1550 HARPER
DETROIT

MI 48211

INSTALLATION ADDRESS

1550 HARPER
DETROIT

MI 48211

EPA Form 8700-12A (4-80)



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

MI0980991566

CITY ENVIRONMENTAL, INC
1923 Frederick
Detroit

MI 48211

INSTALLATION ADDRESS

1923 Frederick
Detroit

MI 48211

EPA Form 8700-12A (4-80)

STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

CITY DISPOSAL SYSTEMS, INC. TRANSFER FACILITY

SOLID WASTE DISPOSAL AREA LICENSE

This license is issued under the provisions of Act 641, Public Acts of 1978, as amended, to permit the operation of a solid waste disposal area in the State of Michigan. This license does not override the necessity of obtaining all clearances and permits as may be required by state law or local ordinance. It is further made a condition of this license that the licensee give notice to public utilities in accordance with Act No. 53 of the Public Acts of 1974, being sections 460.701 to 460.718 of the Michigan Compiled Laws and comply with each of the requirements of that Act. This facility shall not receive liquid wastes without special approval from the health department having jurisdiction or this office.

GRANTED TO: CITY DISPOSAL SYSTEMS, INC.

COUNTY: WAYNE

ISSUE DATE: November 17, 1989

RESPONSIBLE PERSON TO CONTACT:

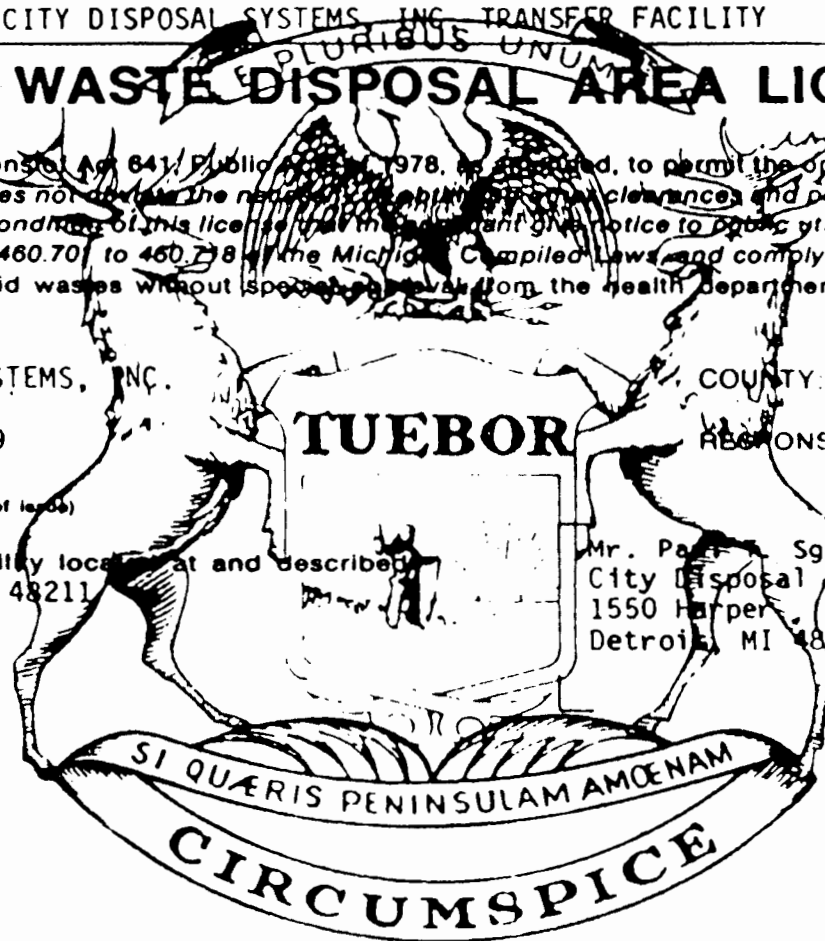
EXPIRATION DATE: (Two years from date of issue)

This license is applicable to the facility located at and described as follows: 1550 Harper, Detroit 48211

Mr. Paul A. Sgallcia
City Disposal Systems, Inc.
1550 Harper
Detroit, MI 48211

Stipulations:

NONE



This license is subject to revocation by the Director of the Department of Natural Resources for any violation of the law under which it is issued or for any violation of the rules authorized thereunder, or any stipulations noted. This license shall be available through the licensee during the entire effective date and remains the property of the Director of the Department of Natural Resources. THIS LICENSE IS NOT TRANSFERABLE

LICENSE NO. N° 7641

David F. Hales, Director

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES

CITY SAND AND LANDFILL, INC. TYPE II

SOLID WASTE DISPOSAL AREA LICENSE

This license is issued under the provisions of Act 641, Public Acts of 1978, as amended, to permit the operation of a solid waste disposal area in the State of Michigan. This license does not obviate the necessity of obtaining other clearances and permits as may be required by state law or local ordinance. It is further made a condition of this license that the licensee give notice to public utilities in accordance with Act No. 53 of the Public Acts of 1974, being sections 460.701 to 460.718 of the Michigan Compiled Laws and comply with each of the requirements of that Act. This facility shall not receive liquid wastes without special approval from the health department having jurisdiction or this office.

GRANTED TO: City Sand and Landfill, Inc.

COUNTY: WAYNE

ISSUE DATE: April 25, 1989

RESPONSIBLE PERSON TO CONTACT:

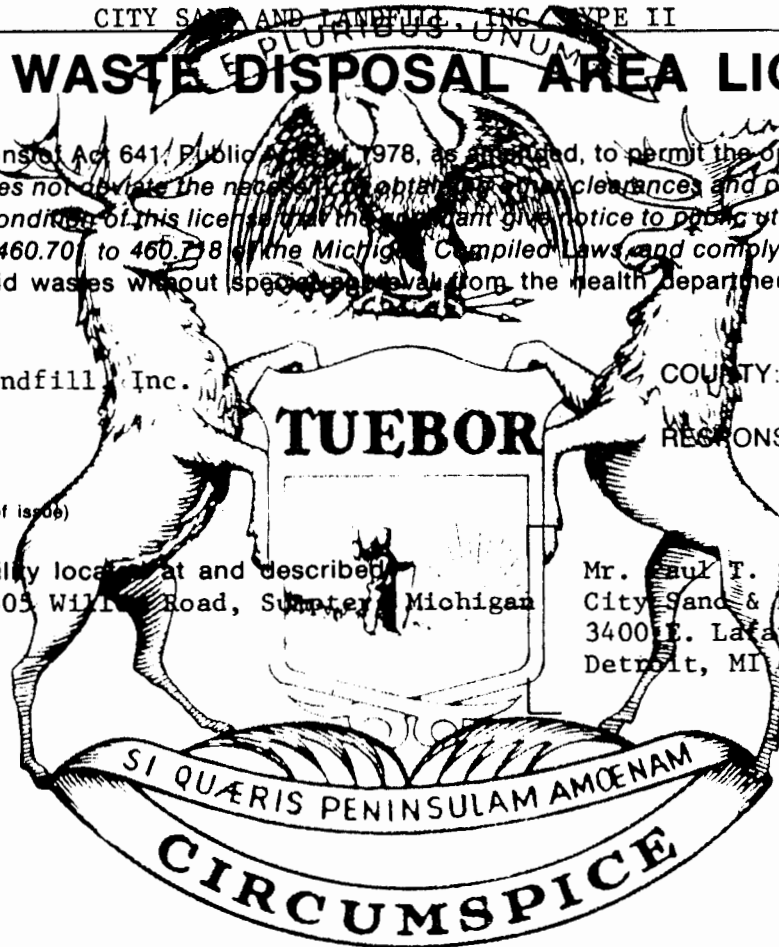
EXPIRATION DATE: (Two years from date of issue)

This license is applicable to the facility located at and described as follows: Sec28, T4S, R8E, 46805 Willis Road, Sumpter, Michigan 48111 (223 acres)

Mr. Paul T. Sgriccia
City Sand & Landfill, Inc.
3400 E. Lafayette Ave.
Detroit, MI 48207

Stipulations:

NONE



This license is subject to revocation by the Director of the Department of Natural Resources for any violation of the law under which it is issued or for any violation of the rules authorized thereunder, or any stipulations noted. This license shall be available through the licensee during the entire effective date and remains the property of the Director of the Department of Natural Resources. THIS LICENSE IS NOT TRANSFERABLE.

LICENSE NO. N^o 7572

Delbert Rector ACTING
David F. Hales, Director

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES

~~CITY ENVIRONMENTAL SAID IDENTIFICATION EACH IN~~
~~PLURIBUS UNUM~~
SOLID WASTE DISPOSAL AREA LICENSE

This license is issued under the provisions of Act 641, Public Acts of 1978, as amended, to permit the operation of a solid waste disposal area in the State of Michigan. *This license does not obviate the necessity of obtaining other clearances and permits as may be required by state law or local ordinance. It is further made a condition of this license that the licensee give notice to public utilities in accordance with Act No. 53 of the Public Acts of 1974, being sections 460.701 to 460.718 of the Michigan Compiled Laws and comply with each of the requirements of that Act. This facility shall not receive liquid wastes without special approval from the health department having jurisdiction or this office.*

GRANTED TO: City Environmental, Inc.

COUNTY: WAYNE

ISSUE DATE: October 27, 1989

RESPONSIBLE PERSON TO CONTACT:

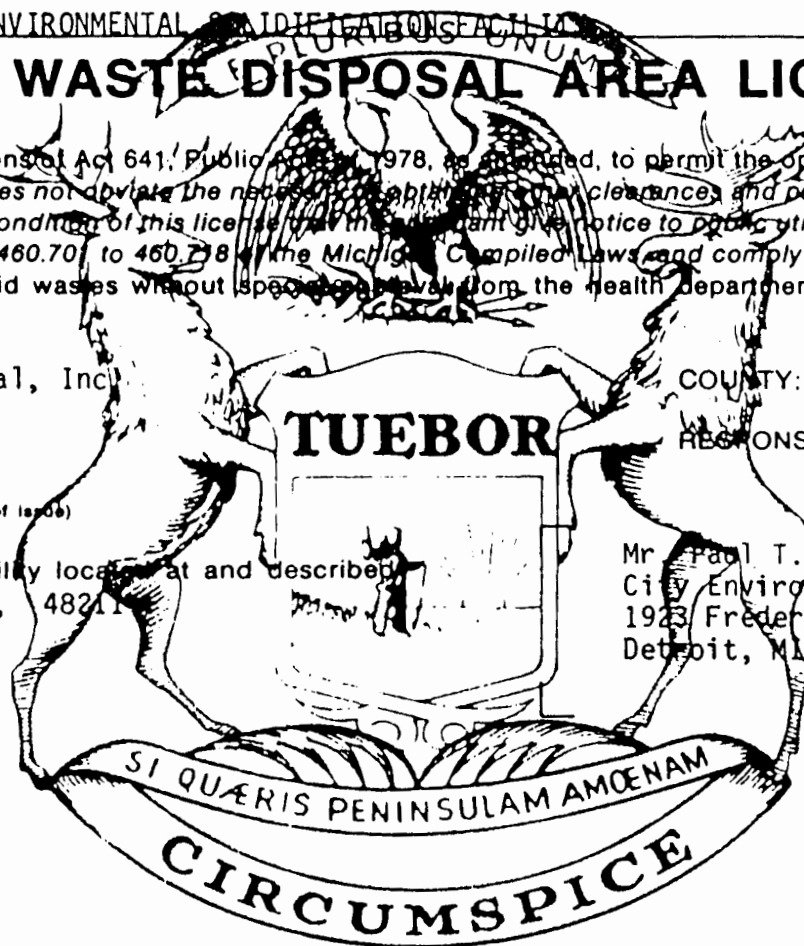
EXPIRATION DATE: (Two years from date of issue)

This license is applicable to the facility located at and described as follows: 1550 Harper, Detroit, 48211

Mr. Paul T. Sgriccia
City Environmental, Inc.
1923 Frederick St.
Detroit, MI 48211

Stipulations:

NONE



This license is subject to revocation by the Director of the Department of Natural Resources for any violation of the law under which it is issued or for any violation of the rules authorized thereunder, or any stipulations noted. This license shall be available through the licensee during the entire effective date and remains the property of the Director of the Department of Natural Resources. THIS LICENSE IS NOT TRANSFERABLE.

LICENSE NO. N° 7636

Delbert R. Hales
David F. Hales, Director



Detroit Water and Sewerage Department
Water Board Building
Detroit, Michigan 48226
(313) 224-4800

Coleman A. Young, Mayor
City of Detroit

DETROIT

WATER AND SEWERAGE DEPARTMENT

WASTEWATER DISCHARGE PERMIT - TYPE 3

Section A: General Information

Permit No. 003-012

Company Name: City Environmental

Premise Address: 1923 Frederick Street

City Detroit, MI Zip Code 48211

Mailing Address Same

City _____, MI Zip Code _____

Primary Standard Industrial Classification (SIC) Code 4213

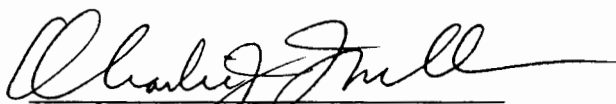
Other SIC Codes 4953

The above Industrial User is authorized to discharge industrial wastewater to the City of Detroit sewer system in compliance with the City's Wastewater Discharge Ordinance and any applicable provisions of federal or state law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

This permit is granted in accordance with the application filed in the office of Director of DWSD, and in conformity with plans, specifications and other data submitted to the City in support of the above application.

Effective Date: November 30, 1987

Expiration Date: September 1, 1992


Charlie J. Williams
Director

ACORD**CERTIFICATE OF INSURANCE**

REC'D JUL - 8 1991

ISSUE DATE (MM/DD/YY)

2-JUL-1991

PRODUCER

10588

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

CORROON & BLACK OF NASHVILLE, INC.

WILLIS CORROON CO.

O. BOX 1020

301 PLUS PARK BLVD.

NASHVILLE TN 37202

(615) 367-9702

Contact : Smith, Donna R.

INSURED

City Sand and Landfill

3400 East Lafayette

Detroit MI 48207

COMPANIES AFFORDING COVERAGECOMPANY
LETTER**A** Certain Companies belonging to the
Institute of London UnderwritersCOMPANY
LETTER**B**COMPANY
LETTER**C**COMPANY
LETTER**D**COMPANY
LETTER**E****COVERAGES**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY	M111/103609	01-APR-1991	01-APR-1992	BODILY INJURY OCC. \$
	<input checked="" type="checkbox"/> COMPREHENSIVE FORM				BODILY INJURY AGG. \$
	<input checked="" type="checkbox"/> PREMISES/OPERATIONS				PROPERTY DAMAGE OCC. \$
	<input checked="" type="checkbox"/> UNDERGROUND EXPLOSION & COLLAPSE HAZARD				PROPERTY DAMAGE AGG. \$
	<input checked="" type="checkbox"/> PRODUCTS/COMPLETED OPER.				BI & PD COMBINED OCC. \$ 1,000,000
	<input checked="" type="checkbox"/> CONTRACTUAL				BI & PD COMBINED AGG. \$ 1,000,000
	<input checked="" type="checkbox"/> INDEPENDENT CONTRACTORS				PERSONAL INJURY AGG. \$ 1,000,000
	<input checked="" type="checkbox"/> BROAD FORM PROPERTY DAMAGE				
	<input checked="" type="checkbox"/> PERSONAL INJURY				
	AUTOMOBILE LIABILITY				BODILY INJURY (Per person) \$
	<input type="checkbox"/> ANY AUTO				BODILY INJURY (Per accident) \$
	<input type="checkbox"/> ALL OWNED AUTOS (Priv. pass.)				PROPERTY DAMAGE \$
	<input type="checkbox"/> ALL OWNED AUTOS (other than priv. pass.)				BODILY INJURY & PROPERTY DAMAGE COMBINED \$
	<input type="checkbox"/> HIRED AUTOS				
	EXCESS LIABILITY				EACH OCCURRENCE \$
	<input type="checkbox"/> UMBRELLA FORM				AGGREGATE \$
	<input type="checkbox"/> OTHER THAN UMBRELLA FORM				
	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY				STATUTORY LIMITS
					EACH ACCIDENT \$
					DISEASE-POLICY LIMIT \$
					DISEASE-EACH EMPLOYEE \$
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

This certificate voids and supercedes all previously issued certificates; as respects General Liability coverage.

CERTIFICATE HOLDER

Compliance Services, Inc.

Attn: Betty James

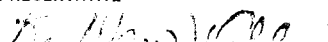
P. O. Box 512

Southeastern PA 19399

ACORD 25 (7/90)

CANCELLATION Except for Non-Payment

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

ACORD. CERTIFICATE OF INSURANCE

REC'D APR 10 1991 471/91

PRODUCER

Corroon & Black of Michigan, Inc.
P. O. Box 2727
Livonia, MI 48151-2727

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW

313-462-0080

COMPANIES AFFORDING COVERAGE

INSURED

City Sand & Landfill, Inc.
City Disposal Systems, Inc.
City Environmental, Inc.
3400 E. Lafayette
Detroit, MI 48207

COMPANY LETTER **A** Lloyds of London
COMPANY LETTER **B** Home Indemnity
COMPANY LETTER **C** National Union Fire Insurance Co.
COMPANY LETTER **D**
COMPANY LETTER **E**

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS
	GENERAL LIABILITY				Per Location
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY CLAIMS MADE OCCUR. OWNER'S & CONTRACTOR'S PROT.	A605	4/1/91	4/1/92	xxxxx GENERAL AGGREGATE \$ 1,000 PRODUCTS-COMP/OPS AGGREGATE \$ 1,000 PERSONAL & ADVERTISING INJURY \$ 1,000 EACH OCCURRENCE \$ 1,000 FIRE DAMAGE (Any one fire) \$ 50 MEDICAL EXPENSE (Any one person) \$ 5
	AUTOMOBILE LIABILITY				COMBINED SINGLE LIMIT
	<input checked="" type="checkbox"/> ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS GARAGE LIABILITY	BAK989403	4/1/91	4/1/92	\$ 1,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	EXCESS LIABILITY				EACH OCCURRENCE \$ AGGREGATE \$
	OTHER THAN UMBRELLA FORM				
B	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	B12096	4/1/91	4/1/92	STATUTORY \$ 1,000 (EACH ACCIDENT) \$ 1,000 (DISEASE--POLICY LIMIT) \$ 1,000 (DISEASE--EACH EMPLOYEE)
C	Professional Legal Liability	PLL7166458	8/29/90	8/29/92	\$1,000,000 Each Loss \$2,000,000 Total All Losses

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER

Compliance Services, Inc.
P. O. Box 512
Southeastern, PA 19399

Attn: Betty James

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Douglas Dingwall

REMTECH

ENVIRONMENTAL GROUP

Permitted Storage/Consolidation Facility

Lewisberry, PA

717/938-6745

PAD 067 089 822

The Remtech Environmental (Lewisberry) LP (REL) TSD facility in Lewisberry specializes in the handling, transfer, storage and consolidation of RCRA-hazardous and non-hazardous wastes. Located approximately 7 miles south of Harrisburg, PA REL also operates transportation and field remediation services from this facility. As a fully permitted TSD, **REL takes title to all wastes received** at the facility, which provides an additional layer of liability protection for its clients.

Waste management services offered by REL include:

- * Bulk materials transfer services
- * Liquid waste consolidation
- * Drum consolidation and bulk transfer
- * Small quantity generator programs
- * Solid waste transportation services
- * Sludge solidification and transportation
- * Lab pack programs

Disposal alternatives include:

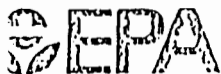
- * Chemical Treatment
- * High Temperature Incineration
- * Secure Chemical Landfill
- * Wastewater Treatment
- * Deep Well Injection
- * Non-Hazardous Landfill
- * Recycling Services

Field remediation services include:

- * Facility decontamination services
- * Waste sampling and analysis
- * High pressure cleaning services
- * Tank cleaning and certified removal services
- * 40-hour OSHA-training per 40 CFR 1910.120(e)
- * Contaminated soils excavation and disposal
- * Pit, pond and lagoon remediation services
- * Packaging of laboratory chemicals
- * 24-hour emergency response services

Acceptable EPA Waste Codes include:

D001	D019	D030	D041	F009	K048
D002	D020	D031	D042	F010	K049
D004	D021	D032	D043	F011	K050
D005	D022	D033	F001	F012	K051
D006	D023	D034	F002	K001	K052
D007	D024	D035	F003	K002	K060
D008	D025	D036	F004	K003	K061
D009	D026	D037	F005	K004	K062
D010	D027	D038	F006	K005	K069
D011	D028	D039	F007	K006	K086
D018	D029	D040	F008	K007	K087
					K100



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA ID NUMBER

PAD067098822

INSTALLATION ADDRESS

REMTECH ENVIRONMENTAL LEWISBERRY INC
550 INDUSTRIAL DR
LEWISBERRY PA 17339

550 INDUSTRIAL DR
LEWISBERRY PA 17339

A Form 8700-12A (4-80)

A-58:Rev. 10/85

PA DEPARTMENT OF ENVIRONMENTAL RESOURCES

HAZARDOUS WASTE TRANSPORTER LICENSE

PA-AH 0146

HWT LICENSE NO.

*****ICRENT*LSG*****

CONDITIONS

07-31-91

EXPIRATION DATE

20

NO. OF COPIES

AMENDED

DEFINITIONS OF CONDITIONS

EP TOXIC	L-LIQUID	(less than 20% solids by dry weight)
IGNITABLE		
CORROSIVE		
TOXIC	S-SOLID	(equal to or greater than 20% solids by dry weight, non-flowable)
REACTIVE		
ACUTE		
HAZARDOUS	G-GAS	(at ambient temperature and pressure)

TRANSPORTER IS LICENSED TO HAUL ONLY THOSE
S OF WASTES IDENTIFIED BY THE CONDITIONS OF
LICENSE.

1991 JAN 31 AM 11:14

NAME OF COMPANY & MAILING ADDRESS

Remtech Environmental Lewisherry, Inc.
550 Industrial Drive
Lewisherry, PA 17339-9537

PHONE NO. 717-938-4700

PHONE NO.

REVERSE FOR ADDITIONAL CONDITIONS

FORM 3510-1 GENERAL	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> F U A N O 1 7 3 3 9 </div>
II. POLLUTANT CHARACTERISTICS <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p style="text-align: center; font-weight: bold;">REVISION #2</p> <p style="text-align: center; font-weight: bold;">PLEASE PLACE LABEL IN THIS SPACE</p> </div>		GENERAL INSTRUCTIONS <p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column. If the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP INDUSTRIAL WASTE REMOVAL, INC.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 KUBER, JAMES C. PRESIDENT	717 439 674

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN
3 550 INDUSTRIAL DRIVE	LEWISBERY
C. STATE D. ZIP CODE	
PA 17339	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME
5 550 INDUSTRIAL DRIVE	YORK
C. CITY OR TOWN	D. STATE E. ZIP CODE F. COUNTY CODE (if known)
6 LEWISBERY	PA 17339

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	R	9	9	7			
(specify) MISCELLANEOUS				(specify)			
C. THIRD				D. FOURTH			
7				7			
(specify)				(specify)			

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?	
INDUSTRIAL WASTE REMOVAL, INC.											
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO											
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)	
F - FEDERAL M - PUBLIC (other than federal or state) S - STATE O - OTHER (specify) P (specify)										A 7 1 7 7 3 R 6 7 4 5	
P - PRIVATE											
E. STREET OR P.O. BOX											
550 INDUSTRIAL DRIVE											
F. CITY OR TOWN					G. STATE		H. ZIP CODE		IX. INDIAN LAND		
INDUSTRIAL PARK					PA		1 7 3 3 0		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)			
9	N			9	P		
B. UIC (Underground Injection of Fluids)				E. OTHER (specify)			
9	U			9	P	A	D
				0 6 7 0 9 8 R 2 2 (specify) EPA ID NUMBER			
C. RCRA (Hazardous Wastes)				E. OTHER (specify)			
9	R			9			
				(specify)			

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

We are a contractor providing specialized services for heavy industry, governments, and transportation offerings: High Power Vacuum Truck Service (wet or dry), Complet Baghouse Maintenance Service, High Volume Sludge/Slurry Pumping, Tanker Hauling, Vacuum Tanker Service, Tank Cleaning (Manual and Automatic Techniques), Oil Spill Recovery, High Pressure Water Blasting, Gas & Lead Freeing of Tanks, Explosion Proof Equipment, Fresh Air Breathing Apparatus, Silo Cleaning, Mobile Sludge Solidification Service, Dry Bulk Transfer, and Industrial Services Supervision and Labor Crews. On occasion, we transport hazardous materials to an approved disposal facility, and on occasion, temporarily store hazardous materials in underground storage tanks (total capacity 90,000 gallons in five (5) tanks). On occasion, we solidify with dust in 15 c.y. batch lots of hazardous wastes to reduce the liquid content adequate for disposal in a secure landfill.

Other methods of dewatering (such as filter press) are anticipated.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
James C. Kohr, P.E., President	James C. Kohr	3/29/95

COMMENTS FOR OFFICIAL USE ONLY

C	D



U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

1. EPA I.D. NUMBER

E	P	A	D	0	6	7	0	9	0	0	2	2	T/A	C
1	2	3	4	5	6	7	8	9	0	1	2	3	4	5

OFFICIAL USE ONLY

DATE RECEIVED	DATE RECEIVED	DATE RECEIVED	DATE RECEIVED	DATE RECEIVED	DATE RECEIVED
YR.	MO.	DAY	YR.	MO.	DAY
77	78	79	77	78	79

COMMENTS

FIRST OR REVISED APPLICATION

Mark an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's I.D. Number in Item I above.

FIRST APPLICATION (place an "X" below and provide the appropriate date)

- ☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

YR.	MO.	DAY
77	78	79

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (Use the boxes to the left)

- ☐ 2. NEW FACILITY (Complete item below.)

YR.	MO.	DAY
77	78	79

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

REVISED APPLICATION (place an "X" below and complete item I above)

- ☒ 1. FACILITY HAS INTERIM STATUS

- ☐ 2. FACILITY HAS A RCRA PERMIT

PROCESSES - CODES AND DESIGN CAPACITIES

PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

AMOUNT - Enter the amount.

UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SLURRY	S02	GALLONS OR LITERS			
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR
Injection:					
SECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
LAND APPLICATION	D81	ACRES OR HECTARES			
LAND DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
TONS	T	TONS PER HOUR	HECTARE-METER	H	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

A. PROCESS CODE (from list above)		B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY		LINE NUMBER	A. PROCESS CODE (from list above)		B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	
1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	1. AMOUNT	2. UNIT OF MEASURE (enter code)	1. AMOUNT	2. UNIT OF MEASURE (enter code)		1. AMOUNT	2. UNIT OF MEASURE (enter code)				
S 0 2	600	G				5						
T 0 3	20	E				6						
S 0 2	90,000	G				7						
I 0 4	15	Y				8						
S 0 3	275	Y				9						
						10						

Continued from the front.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

As a result of cleaning out our vacuum trucks and vacuum tankers, we end up with wash bay sludge containing traces of API Separator Sludge, heavy metals from steel mills, chemical plants, etc. The wet sludge is thoroughly mixed and solidified with dust. Solidification materials can include cement dust, lime, and other inert and delisted dusts, and if appropriate, forest products. Silos for holding working quantities of dust will be erected on the specific concrete pad in the solidification area. Solidification is accomplished in a roll-off container that has a gasketed rear door. This gasket is leak tight and its closure is assured by ratchet lever chain load binders. Dust is placed in the roll-off container to the depth of a couple of inches. On top of the dust, the sludge is placed in the container. Depending on the moisture content of the sludge, more dust is added at the same time that the sludge is placed in. The mixing action is attained with a clam-shell bucket arrangement that agitates and mixes the dust and sludge to the extent that there is no free liquid. A little extra dust is added to assure that no free liquid is worked to the surface during the transportation of the residual to an approved disposal facility. Once the solidification procedure is completed, the roll-off container is then tarped so that no rain or snow can enter it and also to assure that during the course of transportation no fugitive dust is distributed along the route. The front left side of the container is marked in yellow crayon as to the source of the sludge, quantity, and date.

On occasion due to weekends, disposal facility scheduling problems, and weather we may have to temporarily store roll-off containers at our facility.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

page 2.

Copy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

FOR OFFICIAL USE ONLY														
<div style="display: flex; justify-content: space-between;"> W DUP 2 DUP </div>														

V. DESCRIPTION OF HAZARDOUS WASTES (continued)															D. PROCESSES									
LINE NO.	A. EPA HAZARD. WASTENO (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		1. PROCESS CODES (enter)										2. PROCESS DESCRIPTION (If a code is not entered in D(1))			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20				
1	0	0	0	1	16						I	S	0	1	S	0	2							
2	0	0	0	2	13 (liquid)						I	S	0	1	S	0	2							
3	0	0	0	2	20 (solid)						I	S	0	1	S	0	2							
4	0	0	0	4	2						I	S	0	1										
5	0	0	0	5	2						I	S	0	1										
6	0	0	0	6	1						I	S	0	1										
7	0	0	0	7	2						I	S	0	1	S	0	2							
8	0	0	0	8	2						I	I	0	4										
9	0	0	0	9	1						I	S	0	1	S	0	2							
10	0	0	1	0	1						I	S	0	1	S	0	2							
11	0	0	1	1	1						I	S	0	1	S	0	2							
12	0	0	1	1	4						I	S	0	1	S	0	2							
13	0	0	1	2	4						I	S	0	1	S	0	2							
14	0	0	1	3	4						I	S	0	1	S	0	2							
15	0	0	1	4	4						I	S	0	1	S	0	2							
16	0	0	1	5	4						I	S	0	1	S	0	2							
17	0	0	1	6	4						I	S	0	1	S	0	2							
18	0	0	1	7	4						I	S	0	1	S	0	2							
19	0	0	1	8	4						I	S	0	1	S	0	2							
20	0	0	1	9	4						I	S	0	1	S	0	2							
21	0	0	1	0	42						I	S	0	1	S	0	2							
22	0	0	1	1	3						I	S	0	1	S	0	2							
23	0	0	1	2	4						I	S	0	1	S	0	2							
24	0	0	1	1	2						I	S	0	1	S	0	2	1	0	4				
25	0	0	1	2	2						I	S	0	1	S	0	2							
26																								

U.S. D. NUMBER (enter from page 1)

FOR OFFICIAL USE ONLY

DUP

DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K 0 0 3	1	I	S 0 1 S 0 2	
2	K 0 0 4	1	I	S 0 1 S 0 2	
3	K 0 0 5	1	I	S 0 1 S 0 2	
4	K 0 0 6	1	I	S 0 1 S 0 2	
5	K 0 0 7	1	I	S 0 1 S 0 2	
6	K 0 0 8	1	I	S 0 1 S 0 2	
7	K 0 4 8	4	I	S 0 1 S 0 2	
8	K 0 4 9	4	I	S 0 1 S 0 2	
9	K 0 5 0	4	I	S 0 1 S 0 2	
10	K 0 5 1	4	I	I 0 4	
11	K 0 5 2	53	I	S 0 1 S 0 2	
12	K 0 6 0	2	I	I 0 4	
13	K 0 6 1	5	I	S 0 1 S 0 2 T 0 4	
14	K 0 6 2	2	I	S 0 1 S 0 2 T 0 4	
5	K 0 6 9	2	I	S 0 1 S 0 2 T 0 4	
6	K 0 9 6	2	I	S 0 1 S 0 2 T 0 4	
7	K 0 0 7	10	I	S 0 1 T 0 6	
8	K 1 0 0	1	I	S 0 1 S 0 2 T 0 6	
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					
7					
8					
9					
0					

Continued from the front.

V. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

F	P	A	D	0	0	6	7	0	9	8	8	2	2	6
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

VI. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VII. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VIII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	0	1	0	0	0
---	---	---	---	---	---

0	7	6	5	0	1	7
---	---	---	---	---	---	---

IX. FACILITY OWNER☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E KOHR ENTERPRISES		717-766-7659	
3. STREET OR P.O. BOX		4. CITY OR TOWN	
F R.D. #8, BOX 206	G CARLISLE	5. ST. 6. ZIP CODE	
		P A 17013	

X. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
James C. Kohr, P.E., President		3/29/85

XI. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
James C. Kohr, P.E., President	James C. Kohr	3/29/85

ACORD

CERTIFICATE OF INSURANCE

REC'D OCT 22 1990

ISSUE DATE (MM/DD/YY)

10/17/90

PRODUCER

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW

CORROON & BLACK/NOYES SERVICES
300 WEST STATE STREET
MEDIA, PA 19063

CODE

SUB-CODE

INSURED

Remtech Environmental Group LP
SEE ATTACHED
550 Industrial Drive
Lewisberry, PA 17339-9537

COMPANIES AFFORDING COVERAGE

COMPANY
LETTER A

National Union Fire Ins. Co.

COMPANY
LETTER B

Ins. Co. of the State of Pa.

COMPANY
LETTER C

Traveler's Insurance Company

COMPANY
LETTER DCOMPANY
LETTER E

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS
GENERAL LIABILITY					
B X	COMMERCIAL GENERAL LIABILITY	GLCM8030145	4/14/90	4/14/91	GENERAL AGGREGATE \$ 2000
X	CLAIMS MADE OCCUR.				PRODUCTS-COMP/OPS AGGREGATE \$ 2000
	OWNER'S & CONTRACTOR'S PROT.				PERSONAL & ADVERTISING INJURY \$ 2000
	RETRO DATE				EACH OCCURRENCE \$ 2000
	4/14/89				FIRE DAMAGE (Any one fire) \$ 50
					MEDICAL EXPENSE (Any one person) \$ 5
AUTOMOBILE LIABILITY					
X	ANY AUTO	CA8020871	2/24/90	2/24/91	COMBINED SINGLE LIMIT \$ 5000
	ALL OWNED AUTOS				BODILY INJURY (Per person) \$
	SCHEDULED AUTOS				BODILY INJURY (Per accident) \$
X	HIRED AUTOS				PROPERTY DAMAGE \$
X	NON-OWNED AUTOS	CA8020872	2/24/90	2/24/91	
	GARAGE LIABILITY				
	1,000 CSL				
EXCESS LIABILITY					
	OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
C	WORKER'S COMPENSATION	6UB789J451-8-90	2/26/90	1/26/91	STATUTORY \$ 100 (EACH ACCIDENT)
	AND				\$ 500 (DISEASE-POLICY LIMIT)
	EMPLOYERS' LIABILITY				\$ 100 (DISEASE-EACH EMPLOYEE)
OTHER					
A	POLLUTION LIAB.	7166-427 (PA)	4/22/90	4/22/91	SEE ATTACHED
	POLLUTION LIAB.	7166-428 (NJ)	4/14/90	4/14/91	
CLAIMS MADE FORM					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS

AUTOMOBILE LIABILITY POLICIES ARE ENDORSED TO PROVIDE COVERAGE IN CONNECTION WITH TRANSPORTATION OF HAZARDOUS MATERIALS REQUIRED BY THE FEDERAL MOTOR CARRIER ACT OF 1980. THIS CERTIFICATE MAY NOT DISCLOSE ALL RELEVANT INFO.

CERTIFICATE HOLDER

CANCELLATION

Compliance Services, Inc.
Box 512
Northeastern, PA 19399
ATTN: Andy Meadows

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

152389



REMTECH ENVIRONMENTAL GROUP, L.P.

ATTACHMENT FOR CERTIFICATE OF INSURANCE

Named Insured: Remtech Environmental Group, L.P.
 Remtech Environmental Group, Inc.
 Remtech Environmental Lewisberry, Inc.
 Remtech Environmental (NJ), L.P.
 Industrial Waste Removal, Inc.
 Flowen Oil Delaware Valley, Inc.
 Resource Management Technologies, Inc.

Pollution Liability Limits:

Policy #7166-427(PA) \$2,000 Each loss/\$4,000 total all losses

Policy #7166-428(NJ) \$1,000 Each loss/\$2,000 total all losses

GENERATOR'S WASTE MATERIAL PROFILE SHEET

Please complete all sections of this report and supply a one (1) quart representative sample.

The form, sample and analytical data or MSDS should be sent to

City Environmental, Inc., 1923 Frederick, Detroit, Michigan, 48211.

Do not ship waste material for treatment or disposal until a final approval number is given.

Indicate for which facility this material is being submitted.

APPROVED 06/19/91

DISPOSAL FACILITIES (check all that apply)

☐ LANDFILL

City Sand & Landfill, Inc.
46805 Willow Road
Sumpter, Michigan 48111
MID 020 850 422

☐ LANDFILL

Pine Tree Acres, Inc.
36600 29 Mile Road
Richmond, Michigan 48062
MID 185 388 089

☐ WASTEWATER TREATMENT

City Environmental, Inc.
1923 Frederick Street
Detroit, Michigan 48211
MID 980 991 566

☐ LANDFILL

Seymour Road Landfill, Inc.
13164 Seymour Road
Montrose, Michigan 48457
MID 981 188 493

☐ LANDFILL

Peoples Garbage Disposal
4143 East Rathbun Road
Birch Run, Michigan 48415
MID 055 659 072

☐ SOLIDIFICATION

City Environmental, Inc.
1550 Harper Street
Detroit, Michigan 48211
MID 054 683 479

GENERATOR INFORMATION

U. S. EPA ID # PA D 98 72 8 3 4 3 9 (if required)

GENERATOR NAME RECYCLING SCIENCES INTERNATIONAL, INC.

ADDRESS 210 E. 10TH STREET

CITY MARCUS HOOK COUNTY _____ STATE PA ZIP 19061

PHONE NO. (312) 559-0122 EXT. _____ CONTACT GEORGE SULLIVAN

SHIPPING INFORMATION

U. S. EPA ID # _____ (if required)

TRANSPORTER NAME TO BE DETERMINED

ADDRESS _____

CITY _____ COUNTY _____ STATE _____ ZIP _____

PHONE NO. (____) _____ EXT. _____ CONTACT _____

BILLING INFORMATION

CLIENT NAME COMPLIANCE SERVICES, INC.

ADDRESS P.O. BOX 512

CITY SOUTHEASTERN COUNTY _____ STATE PA ZIP 19399

PHONE NO. (215) 254 0842 EXT. _____ CONTACT MARTY MACK

Is a representative sample included? ☒ yes ☐ no

Is analytical test data supplied with this application? ☒ yes ☐ no

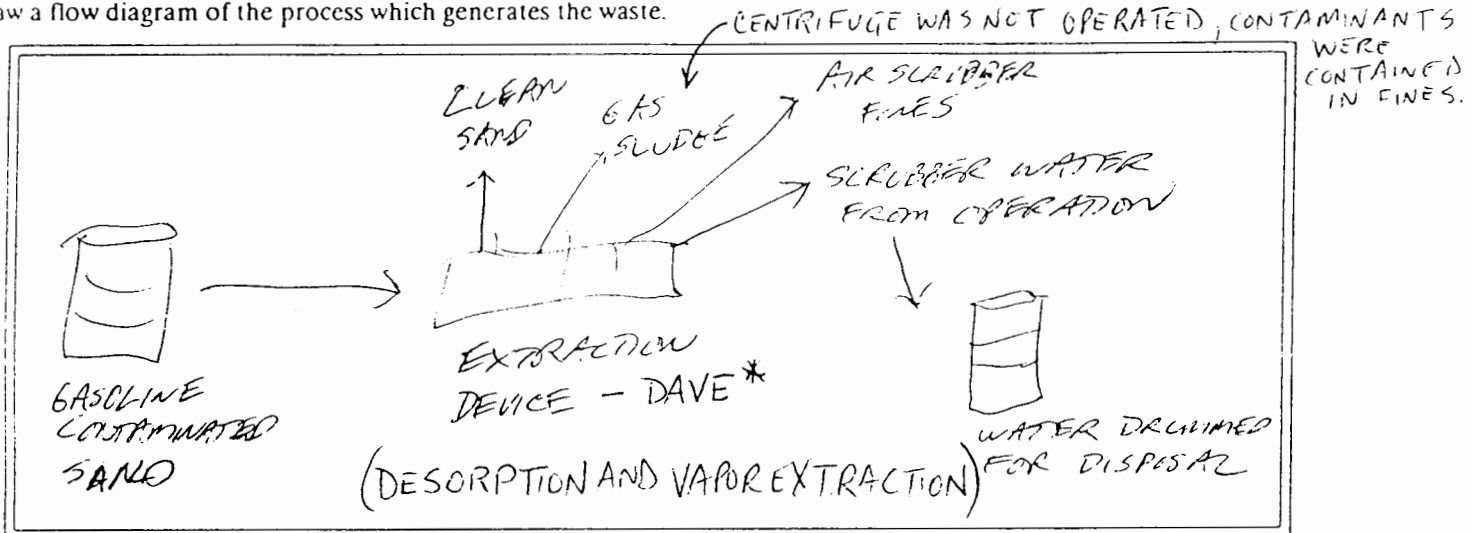
If no, does client authorize C.E.I. to analyze at current list prices? ☒ yes ☐ no Cu, Zn

Common name of waste: DIRTY WATER FROM RECYCLING

Provide a detailed description of the process which generates this waste.

PROCESS WATER FROM OPERATION OF A VAPOR
EXTRACTION DEVICE USED ON A TEST RUN
TO TREAT GASOLINE CONTAMINATED SOIL.

Draw a flow diagram of the process which generates the waste.



IS THE WASTE -

Ignitable: Yes ☒ No ☐
Corrosive: Yes ☒ No ☐
Asbestos: Yes ☒ No ☐
Acid Reactive: Yes ☒ No ☐
Alkaline Reactive: Yes ☒ No ☐

DOES THE WASTE CONTAIN -

Polychlorinated Biphenyls (PCB): Yes ☒ No ☐
Asbestos: Yes ☒ No ☐
Herbicides/Pesticides: Yes ☒ No ☐
Dioxins: Yes ☒ No ☐
Cyanide: Yes ☒ No ☐
Sulfide: Yes ☒ No ☐
Free Ammonia: Yes ☒ No ☐
Infectious Waste: Yes ☒ No ☐

Actual ppm

Is this waste a "Hazardous Waste" as defined by regulations of the U. S. Environmental Protection Agency pursuant to 40 CFR 261 of the Resource Conservation and Recovery Act? ☐ Yes ☒ No

Is this a "Hazardous Waste" as defined by State or Local Regulations? ☐ Yes ☒ No

If Yes, which state? _____

Is this waste derived from a underground storage tank? ☐ Yes ☒ No

If Yes, list all materials stored: _____

CHEMICAL COMPOSITION (no trade name)

WATER	>95	%			%
SUSPENDED SOLIDS		%			%
-DIRT	<5	%			%
		%			%

PHYSICAL CHARACTERISTICS OF WASTE (where not applicable indicate N/A)

- A. Physical State at 70°: ☐ Solid ☒ Liquid ☐ Sludge
☐ Semi-Solid ☐ Powder or Dust ☐ Free Liquids
may be associated with this waste
- B. Phase/Layers: ☒ Single Phase ☐ Bi-Layered ☐ Multi-Layered
- C. Odor: ☐ None ☒ Mild ☐ Strong Describe: _____
- D. pH: 7.9 E. Flash Point: >200°F F. Water Content: >95%
- G. Density: 8.34 lb/gal H. Solids Content: <5% I. Specific Gravity: 1.01
- J. Free Liquids: ☒ Yes ☐ No K. BTU/gal: NA BTU/lb: NA
- L. Chlorine: <0.0001 % M. % Ash: NA
- N. BOD: NA O. COD: NA
- P. TSS: <5 % Q. Sulfur: NA
- R. Phenolics: 0 S. Color: BROWN

SHIPPING INFORMATION

- A. Proper D.O.T. Shipping Name: DIRTY WATER
- B. Hazard Class: NONE UN/NA #: NONE Waste Code # ~~1311~~ 029L
- C. Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solids ☒ Drums
- D. Frequency of Shipment:
☒ one time ☐ week ☐ month
☐ day ☐ one job ☐ year ☐ other
- E. Estimated Quantity of Waste:
☐ Gallons ☐ Cubic Yards
☐ 5 Gallon Cans ☐ 1 Gallon Cans
(5) FIVE DRUMS PROCESS
74 55 Gallon Drums WATER
☐ Bags

NON-HAZARDOUS CERTIFICATION

The generator of the waste described on this profile sheet, by signature below, is a duly authorized representative, and hereby certifies that all information submitted in this and all attached documents is complete and accurate, that all known or suspected hazards have been disclosed, and that this material is considered non-hazardous according to U.S. EPA and Michigan DNR regulations.

Terry D. Sullivan Chairman 3/14/91
Generator's Authorized Signature Title Date



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 FAX

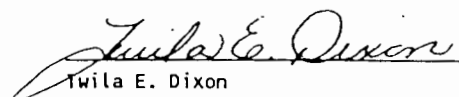
Compliance Services
Recycling Sciences Internation, Inc.
151 S. Warner Rd.
Wayne, PA 19087

Report No. : 902389
Sample Date: 09/17/90 at 14:00
Sampled By : CSM
Received : 09/18/90
Reported : 10/01/90
P.O. Number: 1830

RMC Number : 6565
Sample Description: RSI-W1 DIRTY WATER FROM RECYCLING

Repl	Parameter	Result	Date Anl Completed	Ana-lyst	Method
1	ARSENIC, TOTAL (TCLP)	<0.002 MG/L	09/25/90	JNO	EPA 7060
1	BARIUM, TOTAL (TCLP)	<0.5 MG/L	09/25/90	LMS	EPA 7080
1	CADMIUM, TOTAL (TCLP)	<0.05 MG/L	09/21/90	BAK	EPA 7131
1	CHROMIUM, TOTAL (TCLP)	<0.05 MG/L	09/20/90	JNO	EPA 7191
1	LEAD, TOTAL (TCLP)	<0.1 MG/L	09/21/90	LMS	EPA 7421
1	MERCURY, TOTAL (TCLP)	<0.0002 MG/L	09/24/90	LMS	EPA 7470,7471
1	SELENIUM, TOTAL (TCLP)	<0.002 MG/L	09/25/90	BAK	EPA 7740
1	SILVER, TOTAL (TCLP)	<0.05 MG/L	09/20/90	JNO	EPA 7760
1	P.P.L. VOLATILES (WATER)	SEE VOL. ATTACHMENT	09/25/90	DAF	EPA 524,624
1	PH	7.91 STANDARD	09/19/90	LAC	EPA 9040,9045
1	IGNITABILITY (LIQUID)	NOT IGNITABLE	09/21/90	CM	EPA 1020
1	REACTIVITY	NOT REACTIVE	09/26/90	CM	SW846,SEC 7.3
1	TCLP SETUP - NON-VOLATILES	COMPLETED	09/25/90	WSP	EPA 1311

Approved By:


Twila E. Dixon
Assistant Laboratory Manager



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

RMC Environmental Chemistry Laboratory
Volatile Organic Analysis Data

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 FAX

CLIENT I.D. : RSI-W1 DIRTY WATER

Date Analyzed : 09/25/90

RMC I.D. : 6565

Analyzed By : DAF

COMPOUND	UG/L	CRQL	COMPOUND	UG/L	CRQL
Chloromethane	U	10	cis-1,3-Dichloropropene	U	5
Bromomethane	U	10	Trichloroethene	U	5
Vinyl Chloride	U	10	Benzene	U	5
Chloroethane	U	10	Dibromochloromethane	U	5
Methylene Chloride	4 JB	5	1,1,2-Trichloroethane	U	5
Trichlorofluoromethane	U	5	trans-1,3-Dichloropropene	U	5
1,1-Dichloroethene	U	5	2-Chloroethylvinyl ether	U	10
1,1-Dichloroethane	U	5	Bromoform	U	5
1,2-Dichloroethene (total)	U	5	Tetrachloroethene	U	5
Chloroform	1 J	5	1,1,2,2-Tetrachloroethane	U	5
1,2-Dichloroethane	U	5	Toluene	4 J	5
2-Butanone	U	10	Chlorobenzene	U	5
1,1,1-Trichloroethane	U	5	Ethylbenzene	U	5
Carbon Tetrachloride	U	5	1,3-Dichlorobenzene	U	5
Bromodichloromethane	U	5	1,2 & 1,4-Dichlorobenzene	U	5
1,2-Dichloropropane	U	5			

SURROGATE COMPOUNDS

1,2-Dichloroethane-d4

Toluene-d8

Bromofluorobenzene

RECOVERY

105 %

107 %

99 %

CRQL = Contract Required Quantitation Limit

Qualifiers

(J) Indicates detected below CRQL

(U) Indicates compound not detected

(D) Indicates surrogates have been diluted out

(B) Indicates compound found in blank

Approved By

Laine Kardas

CITY ENVIRONMENTAL, INC. • 1923 FREDERICK ST. • DETROIT, MICHIGAN 48211 • 313 923-0080
FAX: 313 923-0217

DATE: 04/12/91

DATE RECEIVED: 04/09/91
DATE COMPLETED: 04/12/91

CUSTOMER: COMPLIANCE SERVICE
ADDRESS: P.O. BOX 512
CITY, ST., ZIP: SOUTHEASTERN, PA 19399

ATTN: MR. ANDY MEADOWS
PHONE NUMBER: (215) 242-0842
FAX NUMBER: 254-9087

SAMPLE IDENTIFICATION: RECYCLING SCIENCES - WATER RINSEATE

DESCRIPTION: CLEAR LIQUID

SAMPLE NUMBER: 3339

SAMPLE WAS ANALYZED: "AS RECEIVED"

TYPE OF ANALYSIS: TOTAL COPPER & ZINC

DATA: METHODS ARE FOUND IN EPA SW-846 A-C

METALS:	(ppm)	(ppm)
COPPER (7210)	<0.10	100 DNR

ZINC (7950)	<0.10	500 DNR

REVIEWED BY: MOHSEN KAMBOD
REVIEWED BY: REID GONIWIECHA



REMTECH ENVIRONMENTAL GROUP

1800 Carman Street
Camden, NJ 08105
(609) 365-5544
FAX (609) 365-0801

550 Industrial Drive
Lewisberry, PA 17339 9537
(717) 938-4700 (24 hr.)
FAX (717) 938-3301

MATERIAL PROFILE SHEET
GENCODE 54108-A-26
PROCESS CODE _____
PAR NUMBER _____
TSR INITIALS _____

A. GENERATOR INFORMATION

GENERATOR US EPA I.D. PA 091872839177
GENERATOR STATE I.D. PA

GENERATOR NAME PROCLINE SERVICES, INC. BILLING ADDRESS IF DIFFERENT _____

PICK-UP ADDRESS 210 S. 10TH STREET COMPLIANCE SERVICES, INC.
PO BOX 512, SOUTHEASTON, PA 17379

TECHNICAL CONTACT GEORGE WILLIAM TITLE MANAGER PHONE 712 557 0122

NAME OF WASTE ASCLINE CONTROLLED SAND

PROCESS GENERATING WASTE PAID TO BE USED IN CONSTRUCTION - IT WAS CUTTER DIRECTION

B. PHYSICAL CHARACTERISTICS OF WASTE

COLOR/VISUAL DESCRIPTION

BROWN

STRONG INCIDENTAL ☒ YES
ODOR PRESENT? ☐ NO

DESCRIBE ASCLINE

PHYSICAL STATE @ 70°F

☐ SOLID ☐ SINGLE PHASE
☐ LIQUID ☐ BI-LAYERED
☐ POWDER ☐ MULTI-LAYERED
☐ SEMI-SOLID

FREE LIQUIDS

☐ YES 0% ☒ NO
TOTAL SOLIDS 100%

CORROSIVITY (pH)

☐ ≤2.0 ☐ 9.01-12.49
☐ 2.01-5 ☐ ≥12.50
☒ 5.01-9 ☐ EXACT pH _____

SPECIFIC GRAVITY

PHASE I

PHASE II

☐ <0.8 ☐ <0.8
☐ 0.8-1.0 ☐ 0.8-1.0
☐ 1.0-1.1 ☐ 1.0-1.1
☒ >1.2 ☐ >1.2
EXACT _____ EXACT _____
☐ LIQUID ☐ LIQUID
☒ SOLID/SLUDGE ☐ SOLID/SLUDGE

FLASH POINT

☐ <70°F ☐ >200°F
☐ 70°F - 100°F ☐ NO FLASH
☐ 101°F - 139°F ☐ EXACT _____
☒ 140°F - 200°F

IGNITABILITY (SOLIDS)

☐ YES ☒ NO

☐ CLOSED CUP
☐ OPEN CUP

C. OTHER HAZARDOUS CHARACTERISTICS

INDICATE IF THIS WASTE IS ANY OF THE FOLLOWING:

☐ RCRA REACTIVE ☐ RADIOACTIVE
☐ WATER REACTIVE ☐ ETIOLOGICAL
☐ EXPLOSIVE ☐ PESTICIDE MANUFACTURING WASTE
☐ SHOCK SENSITIVE ☐ OTHER _____
☐ PYROPHORIC ☒ NONE OF THE ABOVE

SPECIAL HANDLING CONSIDERATIONS

D. CHEMICAL COMPOSITION

1. SAND RANGE MIN. MAX. 98 - 99.5%
ASCLINE 0.5 - 2%

TOTAL 101.5%

2. INDICATE IF THIS WASTE CONTAINS ANY OF THE FOLLOWING:

NONE or LESS THAN or ACTUAL

PCB's ☒ ☐ <50 ppm _____ ppm
Cyanides ☒ ☐ <250 ppm _____ ppm
Phenolics ☒ ☐ <50 ppm _____ ppm
Sulfides ☒ ☐ <500 ppm _____ ppm

☐ MSDS ATTACHED☒ SUPPLEMENTAL ANALYSIS ATTACHEDDESCRIBE: TECP VOLATILES

PLEASE NOTE: The chemical composition total in the maximum column must be greater than or equal to 100%.

ALSO LIST ALL SUBSTANCES REGULATED UNDER OSHA 1910.1000, SUBPART Z.

NO. OF PAGES ATTACHED: 9

E. METALS (mg/kg or ppm) ☐ EP TOX ☒ TCLP ☐ TOTAL

METAL	EP TOX EPA CODE	LESS THAN	ACTUAL	ACTUAL
ARSENIC	D004	<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <500
BARIUM	D005	<input checked="" type="checkbox"/> <100		
CADMIUM	D006	<input checked="" type="checkbox"/> <1		<input type="checkbox"/> <100
CHROMIUM	D007	<input checked="" type="checkbox"/> <5		
LEAD	D008	<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <500
MERCURY	D009	<input checked="" type="checkbox"/> <0.2		<input type="checkbox"/> <20
SELENIUM	D010	<input checked="" type="checkbox"/> <1		<input type="checkbox"/> <100
SILVER	D011	<input checked="" type="checkbox"/> <5		
CHROMIUM (HEX)		<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <500
COPPER		<input checked="" type="checkbox"/> <5		
NICKEL		<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <134
THALLIUM		<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <130
ZINC		<input checked="" type="checkbox"/> <5		
		<input type="checkbox"/>		

F. LIQUID WASTE CHARACTERISTICS

Fuels and WWT Candidates

ORGANIC PHASE _____% + AQUEOUS PHASE _____% = 100%

RANGE

HEAT VALUE _____ BTU/lb TOC _____ mg/l

TOTAL HALOGENS _____ % _____ mg/l COD _____ mg/l

ASH CONTENT _____ % BOD _____ mg/l

% SULFUR ☐ <0.5% _____ % OIL & GREASE _____ mg/l

BS&W _____ %

WATER CONTENT _____ %

VISCOSITY (cps): _____ @ _____ °F

DOES THIS MATERIAL CONTAIN:

ANTIFREEZE ☐ YES ☐ NOSILICONES ☐ YES ☐ NOGLYCOLS ☐ YES ☐ NO

G. SHIPPING/MANIFEST INFORMATION

Per: ☐ Week ☐ Month ☐ Year ☒ One Time OnlyIs this a DOT Hazardous Material? ☐ YES ☐ NO Volume/Units _____ ☐ Lb ☐ Gal. ☐ Tons ☐ Cu.Yd. ☐ Other _____Proper Shipping Name (Table 172.101, 49 CFR): PCB-contaminated waste (PCB)Hazard Class: PCB-1 I.D. # NA9189

Additional Description: _____

Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solid ☐ Bulk Sludge ☒ Drums (Type 55) ☐ Other _____Anticipated Transporter: ICM Transporter Contact/Phone: _____

Transporter USEPA I.D.: _____ Transporter State I.D.: _____

CERCLA Reportable Quantity (RQ) (49 CFR APPENDIX TO 172.101): _____ RQ UNITS (lb/kg): _____

USEPA Hazardous Waste? ☒ YES ☐ NO USEPA Hazardous Waste Number: PCB1State Hazardous Waste? ☐ YES ☐ NO State Hazardous Waste Number: _____ HAZARD CODES _____

H. WASTE CERTIFICATION

- Is this a spent solvent waste as defined in 40 CFR 261.31 EPA Hazardous Waste numbers F001, F002, F003, F004, F005? ☐ YES ☒ NO
- Is this a Dioxin Waste as specified in 40 CFR 261.31 EPA Hazardous Waste numbers F020, F021, F022, F023, F026, F027, F028? ☐ YES ☒ NO
- Has the EPA Toxicity Characteristic Leaching Procedure (TCLP) been performed on this waste? ☒ YES ☐ NO
- If yes, are there resultant concentrations of the constituents below allowable limits as specified by Part 268.41 of 40 CFR (please attach)? ☐ YES ☒ NO
- Is this a hazardous waste which contains halogenated organic compounds found in Appendix III of Part 268 40 CFR in total concentration greater than or equal to 1,000 mg/l?
If yes, the waste contains over 1000 ppm but less than 4000 ppm HOC's and as a generator I can meet the requirements under 40 CFR 268.40 to rebut the presumption of hazardous waste. ☐ YES ☒ NO
- Is this waste stream a California list waste that requires notification with each shipment as specified in 40 CFR 268.77? If not, I certify that I have analysis and/or knowledge with the documentation in my file to support this statement. ☐ YES ☒ NO
- Is this a waste stream restricted from land disposal under Part 268 of 40 CFR as first, second, or third third listed restricted waste? ☐ YES ☒ NO
- Does this waste contain any polychlorinated biphenyls (PCB's)? ☐ YES ☒ NO
- Does this waste contain any herbicides, pesticides, dioxin or residues, thereof? ☐ YES ☒ NO
- Is this waste considered non hazardous by USEPA standards? ☐ YES ☒ NO

The authorized signatory on this MPS certifies under penalty of law that the above information in Section H is true.

INITIALS MA

I. MPS CHANGE VERIFICATION

I hereby authorize REMTECH to amend and/or correct any information on the MPS with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue my approval.

INITIALS MA

REMTECH USE ONLY

REMTECH APPROVAL PROCESS

INITIALS DATE

TECH. BTZ 3-27-91OPS. MA 3-27-91MGMT. MA 3-27-91☐ DISAPPROVED

GENERATOR CERTIFICATION:

I hereby certify that all information submitted in this and all attached documents is complete, contains true and accurate descriptions and is representative of the waste material, and that all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

If REMTECH discovers, after having taken delivery of the waste, that any waste does not conform to the identification and description on this MPS, then REMTECH shall provide notice of such condition to the Generator and coordinate the return of the nonconforming waste to the point of origin as set forth on the manifest or to such other locations designated in writing by the Generator. Generator agrees to reimburse REMTECH for all handling, packaging, clean up and transportation costs or charges, damage to equipment, and costs associated with lost time incurred by REMTECH during the receipt, handling, temporary storage and return of such nonconforming waste to point of origin or to such other location designated by Generator.

Authorized Signature George J. SullivanTitle ChlorineName (Print or Type) George J. SullivanDate Feb 13, 1991

REMTECH ENVIRONMENTAL GROUP

1800 Carman Street
Camden, NJ 08105
(609) 365-5544
FAX (609) 365-0801

550 Industrial Drive
Lewisberry, PA 17339-9537
(717) 938-4700 (24 hr.)
FAX (717) 938-3301

MATERIALS FILE SHEET

GENCODE _____
PROCESS CODE _____
PAR NUMBER _____
TSR INITIALS _____

A. GENERATOR INFORMATION

GENERATOR US EPA I.D. PAD987283439
GENERATOR STATE I.D. _____

GENERATOR NAME RECYCLING SCIENCES INTL, INC. BILLING ADDRESS IF DIFFERENT _____

PICK-UP ADDRESS 210 E. 10TH STREET
MARLBOROUGH, MA 01901

CONTACT _____

TECHNICAL CONTACT GEORGE SULLIVAN TITLE PRESIDENT PHONE 312 559 0122

NAME OF WASTE GASOLINE CONTAMINATED SAND

PROCESS GENERATING WASTE SAND PURPOSELY CONTAMINATED WITH GAS FOR TEST EXTRACTION

B. PHYSICAL CHARACTERISTICS OF WASTE

COLOR/VISUAL DESCRIPTION

BROWN

STRONG INCIDENTAL ☒ YES
ODOR PRESENT? ☐ NO

DESCRIBE GASOLINE

PHYSICAL STATE @ 70°F

☒ SOLID ☒ SINGLE PHASE
☐ LIQUID ☐ BI-LAYERED
☐ POWDER ☐ MULTI-LAYERED
☐ SEMI-SOLID

FREE LIQUIDS

☐ YES 0 % ☒ NO

TOTAL SOLIDS 100 %

CORROSIVITY (pH)

☐ ≤ 2.0 ☐ 9.01-12.49
☐ 2.01-5 ☐ ≥ 12.50
☒ 5.01-9 ☐ EXACT pH _____

SPECIFIC GRAVITY

PHASE I

PHASE II

☐ < 0.8
☐ 0.8-1.0
☐ 1.0-1.1
☒ > 1.2

☐ < 0.8
☐ 0.8-1.0
☐ 1.0-1.1
☐ > 1.2

EXACT _____

EXACT _____

☐ LIQUID☐ LIQUID☒ SOLID/SLUDGE☐ SOLID/SLUDGE

FLASH POINT

☐ < 70°F
☐ 70°F - 100°F
☐ 101°F - 139°F
☒ 140°F - 200°F

☐ > 200°F
☐ NO FLASH

EXACT _____

☐ CLOSED CUP☐ OPEN CUP

IGNITABILITY (SOLIDS)

☐ YES ☒ NO

C. OTHER HAZARDOUS CHARACTERISTICS

INDICATE IF THIS WASTE IS ANY OF THE FOLLOWING:

☐ RCRA REACTIVE ☐ RADIOACTIVE
☐ WATER REACTIVE ☐ ETIOLOGICAL
☐ EXPLOSIVE ☐ PESTICIDE MANUFACTURING WASTE
☐ SHOCK SENSITIVE ☐ OTHER _____
☐ PYROPHORIC ☒ NONE OF THE ABOVE

SPECIAL HANDLING CONSIDERATIONS

D. CHEMICAL COMPOSITION

1.

RANGE
MIN.-MAX.

1.	RANGE MIN.-MAX.	
<u>SAND</u>	<u>98.945</u> %	
<u>GASOLINE</u>	<u>0.5 - 2</u> %	
_____	_____ %	
_____	_____ %	
_____	_____ %	
_____	_____ %	
_____	_____ %	
_____	_____ %	
_____	_____ %	
TOTAL	<u>101.5</u> %	

2. INDICATE IF THIS WASTE CONTAINS ANY OF THE FOLLOWING:

NONE or LESS THAN or ACTUAL

PCB's ☒ ☐ < 50 ppm _____ ppm
Cyanides ☒ ☐ < 250 ppm _____ ppm
Phenolics ☒ ☐ < 50 ppm _____ ppm
Sulfides ☒ ☐ < 500 ppm _____ ppm

☐ MSDS ATTACHED☒ SUPPLEMENTAL ANALYSIS ATTACHEDDESCRIBE: TECP VOLATILES

PLEASE NOTE: The chemical composition total in the maximum column must be greater than or equal to 100%.

ALSO LIST ALL SUBSTANCES REGULATED UNDER
OSHA 1910.1000, SUBPART Z.

NO. OF PAGES ATTACHED: 9

E. METALS (mg/kg or ppm) ☐ EP TOX ☒ TCLP ☐ TOTAL

METAL	EP TOX EPA CODE	LESS THAN	ACTUAL	ACTUAL
ARSENIC	D004	<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <500
BARIUM	D005	<input checked="" type="checkbox"/> <100		
CADMIUM	D006	<input checked="" type="checkbox"/> <1		<input type="checkbox"/> <100
CHROMIUM	D007	<input checked="" type="checkbox"/> <5		
LEAD	D008	<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <500
MERCURY	D009	<input checked="" type="checkbox"/> <0.2		<input type="checkbox"/> <20
SELENIUM	D010	<input checked="" type="checkbox"/> <1		<input type="checkbox"/> <100
SILVER	D011	<input checked="" type="checkbox"/> <5		
CHROMIUM (HEX)	-	<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <500
COPPER	-	<input checked="" type="checkbox"/> <5		
NICKEL	-	<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <134
THALLIUM	-	<input checked="" type="checkbox"/> <5		<input type="checkbox"/> <130
ZINC	-	<input checked="" type="checkbox"/> <5		
		<input type="checkbox"/>		
		<input type="checkbox"/>		

F. LIQUID WASTE CHARACTERISTICS

Fuels and WWT Candidates

ORGANIC PHASE _____% + AQUEOUS PHASE _____% = 100%

RANGE
HEAT VALUE _____ BTU/lb TOC _____ mg/l
TOTAL HALOGENS _____% _____ mg/l COD _____ mg/l
ASH CONTENT _____% BOD _____ mg/l
% SULFUR ☐ <0.5% _____% OIL & GREASE _____ mg/l
BS&W _____%
WATER CONTENT _____%
VISCOSITY (cpe): _____ @ _____ °F

DOES THIS MATERIAL CONTAIN:

ANTIFREEZE ☐ YES ☐ NO
SILICONES ☐ YES ☐ NO
GLYCOLS ☐ YES ☐ NO

G. SHIPPING/MANIFEST INFORMATION

5-6 Drums Per.

☐ Week ☐ Month ☐ Year ☒ One Time OnlyIs this a DOT Hazardous Material? ☒ YES ☐ NO Volume/Units 2300 ☐ Lb ☒ Gal. ☐ Tons ☐ Cu.Yd. ☐ Other _____Proper Shipping Name (Table 172.101, 49 CFR): RG, HAZARDOUS WASTE SOLID, NOS (D018)Hazard Class: ORM-E I.D. # NA9189

Additional Description: _____

Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solid ☐ Bulk Sludge ☒ Drums (Type 55) ☐ Other _____Anticipated Transporter: JOHN PEROMMER Transporter Contact/Phone: _____ () _____

Transporter USEPA I.D.: _____ Transporter State I.D.: _____

CERCLA Reportable Quantity (RQ) (49 CFR APPENDIX TO 172.101): _____ RQ UNITS (lb/kg): _____

USEPA Hazardous Waste? ☒ YES ☐ NO USEPA Hazardous Waste Number: D018 _____State Hazardous Waste? ☐ YES ☒ NO State Hazardous Waste Number: _____ HAZARD CODES _____

H. WASTE CERTIFICATION

- Is this a spent solvent waste as defined in 40 CFR 261.31 EPA Hazardous Waste numbers F001, F002, F003, F004, F005? ☐ YES ☒ NO
- Is this a Dioxin Waste as specified in 40 CFR 261.31 EPA Hazardous Waste numbers F020, F021, F022, F023, F026, F027, F028? ☐ YES ☒ NO
- Has the EPA Toxicity Characteristic Leaching Procedure (TCLP) been performed on this waste? ☒ YES ☐ NO
- If yes, are there resultant concentrations of the constituents below allowable limits as specified by Part 268.41 of 40 CFR (please attach)? ☐ YES ☒ NO
- Is this a hazardous waste which contains halogenated organic compounds found in Appendix III of Part 268 40 CFR in total concentration greater than or equal to 1,000 mg/l?
If yes, the waste contains over 1000 ppm but less than 4000 ppm HOC's and as a generator I can meet the requirements under 40 CFR 266.40 to rebut the presumption of hazardous waste. ☐ YES ☒ NO
- Is this waste stream a California list waste that requires notification with each shipment as specified in 40 CFR 268.77? If not, I certify that I have analysis and/or knowledge with the documentation in my file to support this statement. ☐ YES ☒ NO
- Is this a waste stream restricted from land disposal under Part 268 of 40 CFR as first, second, or third third listed restricted waste? ☐ YES ☒ NO
- Does this waste contain any polychlorinated biphenyls (PCB's)? ☐ YES ☒ NO
- Does this waste contain any herbicides, pesticides, dioxin or residues, thereof? ☐ YES ☒ NO
- Is this waste considered non-hazardous by USEPA standards? ☐ YES ☒ NO

INITIALS _____

The authorized signatory on this MPS certifies under penalty of law that the above information in Section H is true.

I. MPS CHANGE VERIFICATION

I hereby authorize REMTECH to amend and/or correct any information on the MPS with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue my approval.

INITIALS _____

REMTECH USE ONLY

REMTECH
APPROVAL PROCESS
INITIALS DATE

TECH. _____

OPS. _____

MGMT. _____

☐ DISAPPROVED

GENERATOR CERTIFICATION:

I hereby certify that all information submitted in this and all attached documents is complete, contains true and accurate descriptions and is representative of the waste material, and that all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

If REMTECH discovers, after having taken delivery of the waste, that any waste does not conform to the identification and description on this MPS, then REMTECH shall provide notice of such condition to the Generator and coordinate the return of the nonconforming waste to the point of origin as set forth on the manifest or to such other locations designated in writing by the Generator. Generator agrees to reimburse REMTECH for all handling, packaging, clean up and transportation costs or charges, damage to equipment, and costs associated with lost time incurred by REMTECH during the receipt, handling, temporary storage and return of such nonconforming waste to point of origin or to such other location designated by Generator.

Authorized Signature _____

Title _____

Name (Print or Type) _____

Date _____



CERTIFICATE OF ANALYSIS

Compliance Service/Ultrowix
151 S. Warner Rd.
Wayne, PA 19087

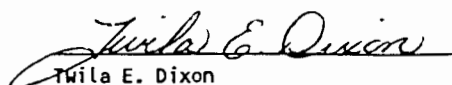
RMC Number : 6571
Sample Description: ULT-4 SAND CONT. W/GAS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215-327-4850
215-327-4852 Fax

Report No. : 902390
Sample Date: 09/15/90 at 11:30
Sampled By : CSM
Received : 09/18/90
Reported : 09/28/90
P.O. Number: 1830

Repl	Parameter	Result	Date Anl Completed	Ana-lyst	Method
1	TCLP VOLATILES (TCLP LEACH)	. SEE VOL. ATTACHMENT	09/26/90	DAF	EPA 8240
1	TCLP SETUP - VOLATILES	. COMPLETED	09/20/90	JEC	EPA 1311

Approved By:


Twila E. Dixon
Assistant Laboratory Manager



ENVIRONMENTAL
SERVICES

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 FAX

CERTIFICATE OF ANALYSIS

RMC Environmental Chemistry Laboratory
Volatile Organic Analysis Data

CLIENT I.D. : ULT-4 SAND CONT. W/GAS
RMC I.D. : 6571 TCLP

Date Analyzed : 09/26/90
Analyzed By : DAF

COMPOUND	UG/L	CRQL	COMPOUND	UG/L	CRQL
Vinyl Chloride	U	1000	Trichloroethene	U	500
1,1-Dichloroethene	U	500	Benzene	2800	500
Chloroform	U	500	Tetrachloroethene	U	500
1,2-Dichloroethane	U	500	Chlorobenzene	U	500
2-Butanone	U	1000	1,2 & 1,4-Dichlorobenzene	U	500
Carbon Tetrachloride	U	500			

<u>SURROGATE COMPOUNDS</u>	<u>RECOVERY</u>
1,2-Dichloroethane-d4	<u>109 %</u>
Toluene-d8	<u>103 %</u>
Bromofluorobenzene	<u>103 %</u>

CRQL = Contract Required Quantitation Limit

Qualifiers

- (J) Indicates detected below CRQL
- (U) Indicates compound not detected
- (D) Indicates surrogates have been diluted out
- (B) Indicates compound found in blank

Approved By

Laine Kardas



RMC Environmental Chemistry Laboratory
Volatile Organic Analysis Data

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 FAX

Date Analyzed : 09/26/90
Analyzed By : DAF

COMPOUND	UG/L	CRQL
Trichloroethene	U	5
Benzene	U	5
Tetrachloroethene	U	5
Chlorobenzene	U	5
1,2 & 1,4-Dichlorobenzene	U	5

SURROGATE COMPOUNDS	RECOVERY
1,2-Dichloroethane-d ₄	100 %
Toluene-d ₈	99 %
Bromofluorobenzene	101 %

CRQL = Contract Required Quantitation Limit

Qualifiers

- (J) Indicates detected below CRQL
(U) Indicates compound not detected
(D) Indicates surrogates have been diluted out
(B) Indicates compound found in blank

Approved By

Laine Kasdars



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

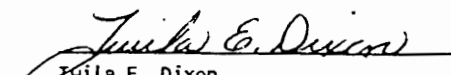
Compliance Service/Ultrowix
151 S. Warner Rd.
Wayne, PA 19087

RMC Number : 6570
Sample Description: ULT-3 SAND CONT. W/GAS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215-327-4850
215-327-4852 FAX
Report No. : 902390
Sample Date: 09/15/90 at 11:30
Sampled By : CSM
Received : 09/18/90
Reported : 09/28/90
P.O. Number: 1830

Repl	Parameter	Result	Date Anal Completed	Ana- lyst	Method
1	TCLP VOLATILES (TCLP LEACH)	SEE VOL. ATTACHMENT	09/26/90	DAF	EPA 8240
1	TCLP SETUP - VOLATILES	COMPLETED	09/20/90	JEC	EPA 1311

Approved By:


Twila E. Dixon
Assistant Laboratory Manager



ENVIRONMENTAL
SERVICES

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215-327-4850
215-327-4852 FAX

CERTIFICATE OF ANALYSIS

RMC Environmental Chemistry Laboratory
Volatile Organic Analysis Data

CLIENT I.D.: ULT-3 SAND CONT. W/GAS
RMC I.D.: 6570 TCLP

Date Analyzed: 09/26/90
Analyzed By: DAF

COMPOUND	UG/L	CRQL	COMPOUND	UG/L	CRQL
Vinyl Chloride	U	1000	Trichloroethene	U	500
1,1-Dichloroethene	U	500	Benzene	1500	500
Chloroform	U	500	Tetrachloroethene	U	500
1,2-Dichloroethane	U	500	Chlorobenzene	U	500
2-Butanone	U	1000	1,2 & 1,4-Dichlorobenzene	U	500
Carbon Tetrachloride	U	500			

<u>SURROGATE COMPOUNDS</u>	<u>RECOVERY</u>
1,2-Dichloroethane-d4	<u>106 %</u>
Toluene-d8	<u>104 %</u>
Bromofluorobenzene	<u>102 %</u>

CRQL = Contract Required Quantitation Limit

Qualifiers

- (J) Indicates detected below CRQL
- (U) Indicates compound not detected
- (D) Indicates surrogates have been diluted out
- (B) Indicates compound found in blank

Approved By

Laine Kardos

C H

10-199 11140 MOHAN PALAT

P.02

WAYNE ANALYTICAL & ENVIRONMENTAL SERVICES, INC.

99 Old Eagle School Rd.
Wayne, PA 19087

(215) 688-7485

To
ECS

Sample# WAS2868-2869
Sample recd: 09/15/90
Report date: 09/19/90

Sand contaminated with gasoline from Ultronic.

TCLP volatiles

WAS#	Limit	2868	2869
Sample ID		Ult-1	Ult-2
	(ppm)	(ppm)	(ppm)
<u>Parameters</u>			
Benzene	0.5	0.007	0.50
Carbon tetra-			
chloride	0.5	ND	ND
Chloroform	6.0	ND	ND
Chlorobenzene	100	ND	ND
1,4 Dichlorobenzene	7.5	0.0008	0.0004
MEK	200	ND	ND
Tetrachloro ethene	0.7	ND	ND
Tri chloroethene	0.5	ND	ND
Vinyl chloride	0.2	ND	ND
1,2- Dichloroethane	0.5	ND	ND
1.1.dichloroethene	0.7	ND	ND

BTEX		
benzene	3.52	185.00
toluene	20.48	179.90
ethyl-benzene	4.60	7.70
xylene	27.23	10.48

* All values are in mg/l

Kai Pantharay

Mohan Palat
09/20/90

GENERATOR'S WASTE MATERIAL PROFILE SHEET

Please complete all sections of this report and supply a one (1) quart representative sample.

The form, sample and analytical data or MSDS should be sent to

City Environmental, Inc., 1923 Frederick, Detroit, Michigan, 48211.

Do not ship waste material for treatment or disposal until a final approval number is given.

Indicate for which facility this material is being submitted.

APPROVED 04/24/91

DISPOSAL FACILITIES (check all that apply)

☐ LANDFILL
City Sand & Landfill, Inc.
46805 Willow Road
Sumpter, Michigan 48111
MID 020 850 422

☐ LANDFILL
Pine Tree Acres, Inc.
36600 29 Mile Road
Richmond, Michigan 48062
MID 185 388 089

☐ WASTEWATER TREATMENT
City Environmental, Inc.
1923 Frederick Street
Detroit, Michigan 48211
MID 980 991 566

☐ LANDFILL
Seymour Road Landfill, Inc.
13164 Seymour Road
Montrose, Michigan 48457
MID 981 188 493

☐ LANDFILL
Peoples Garbage Disposal
4143 East Rathbun Road
Birch Run, Michigan 48415
MID 055 659 072

☐ SOLIDIFICATION
City Environmental, Inc.
1550 Harper Street
Detroit, Michigan 48211
MID 054 683 479

GENERATOR INFORMATION

U. S. EPA ID # PA D 9 8 7 2 8 3 4 3 9 (if required)

GENERATOR NAME RECYCLING SCIENCES INTERNATIONAL, INC.

ADDRESS 210 E. 10TH STREET

CITY MARCUS HOOK COUNTY _____ STATE PA ZIP 19061

PHONE NO. (312) 559-0122 EXT. _____ CONTACT GEORGE SULLIVAN

SHIPPING INFORMATION

U. S. EPA ID # _____ (if required)

TRANSPORTER NAME TO BE DETERMINED

ADDRESS _____

CITY _____ COUNTY _____ STATE _____ ZIP _____

PHONE NO. (____) _____ EXT. _____ CONTACT _____

BILLING INFORMATION

CLIENT NAME COMPLIANCE SERVICES, INC.

ADDRESS P.O. BOX 512

CITY SOUTHEASTERN COUNTY _____ STATE PA ZIP 19399

PHONE NO. (215) 254 0842 EXT. _____ CONTACT MARTY MACK

Is a representative sample included? ☒ yes ☐ no

Is analytical test data supplied with this application? ☒ yes ☐ no

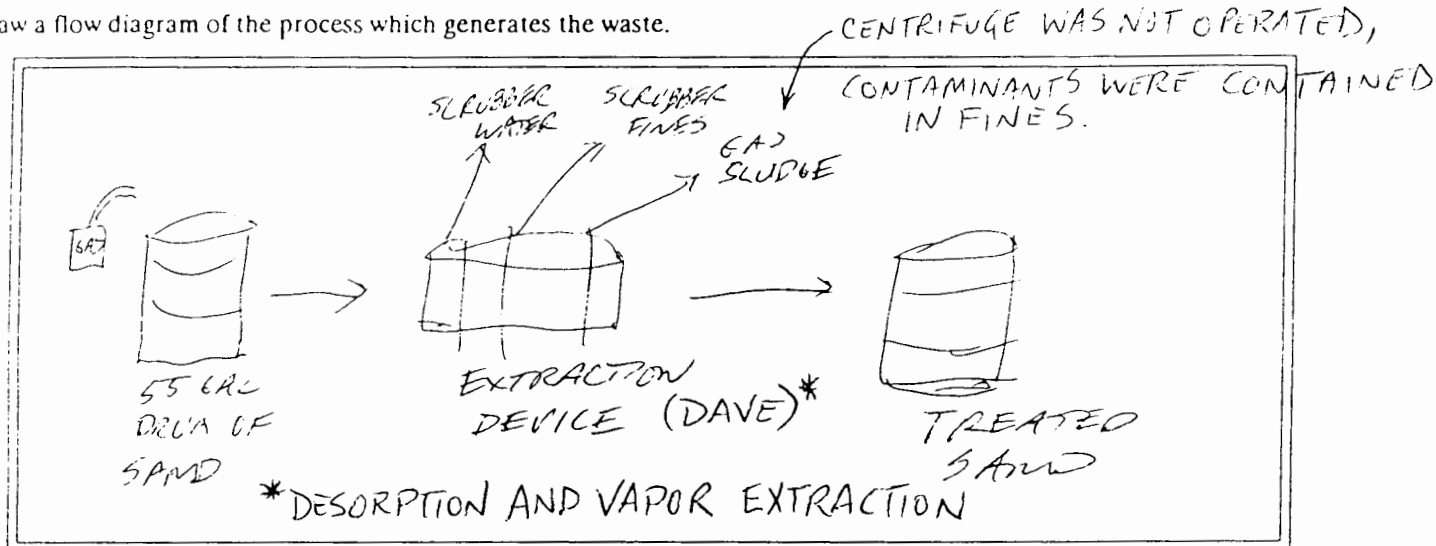
If no, does client authorize C.E.I. to analyze at current list prices? ☒ yes ☐ no For Cu, Zn

Common name of waste: TREATED SAND

Provide a detailed description of the process which generates this waste.

600 LBS CONTAMINATED SAND WAS CREATED FOR
A TEST RUN IN RSI'S RECYCLING + EXTRACTION
MACHINE. THIS IS THE TREATED SAND AFTER
VAPOR EXTRACTION.

Draw a flow diagram of the process which generates the waste.



IS THE WASTE -

Ignitable: ☐ Yes ☒ No
Corrosive: ☐ Yes ☒ No
Asbestos: ☐ Yes ☒ No
Acid Reactive: ☐ Yes ☒ No
Alkaline Reactive: ☐ Yes ☒ No

DOES THE WASTE CONTAIN -

Polychlorinated Biphenyls (PCB): ☐ Yes ☒ No
Asbestos: ☐ Yes ☒ No
Herbicides/Pesticides: ☐ Yes ☒ No
Dioxins: ☐ Yes ☒ No
Cyanide: ☐ Yes ☒ No
Sulfide: ☐ Yes ☒ No
Free Ammonia: ☐ Yes ☒ No
Infectious Waste: ☐ Yes ☒ No

Actual ppm

Is this waste a "Hazardous Waste" as defined by regulations of the U. S. Environmental Protection Agency pursuant to 40 CFR 261 of the Resource Conservation and Recovery Act? ☐ Yes ☒ No

Is this a "Hazardous Waste" as defined by State or Local Regulations? ☐ Yes ☒ No

If Yes, which state? _____

Is this waste derived from a underground storage tank? ☐ Yes ☒ No

If Yes, list all materials stored: _____

CHEMICAL COMPOSITION (no trade name)

<u>SAND</u>	<u>100</u>	%			%
		%			%
		%			%
		%			%

PHYSICAL CHARACTERISTICS OF WASTE (where not applicable indicate N/A)

- A. Physical State at 70°: ☒ Solid ☐ Liquid ☐ Sludge
☐ Semi-Solid ☐ Powder or Dust ☐ Free Liquids
may be associated with this waste
- B. Phase/Layers: ☒ Single Phase ☐ Bi-Layered ☐ Multi-Layered
- C. Odor: ☒ None ☐ Mild ☐ Strong Describe: _____
- D. pH: 6.7 E. Flash Point: > 200 °F F. Water Content: < 1 %
- G. Density: 2.520 lb/KD H. Solids Content: 99 % I. Specific Gravity: 1.5-1.8
- J. Free Liquids: ☐ Yes ☒ No K. BTU/gal: NA BTU/lb: NA
- L. Chlorine: < 5 PPB M. % Ash: NA
- N. BOD: NA O. COD: NA
- P. TSS: 100 % Q. Sulfur: < 0.1 %
- R. Phenolics: 0 S. Color: BROWN

SHIPPING INFORMATION

- A. Proper D.O.T. Shipping Name: SAND
- B. Hazard Class: NONE UN/NA #: NONE Waste Code # NONE
- C. Method of Shipment: ☐ Bulk Liquid ☐ Bulk Solids ☒ Drums
- D. Frequency of Shipment:
☒ one time ☐ week ☐ month
☐ day ☐ one job ☐ year ☐ other
- E. Estimated Quantity of Waste:
☐ Gallons ☐ Cubic Yards (1) ONE DRUM PROCESSED SAND
☐ 5 Gallon Cans ☐ 1 Gallon Cans ~~55~~ Gallon Drums
☐ Bags

NON-HAZARDOUS CERTIFICATION

The generator of the waste described on this profile sheet, by signature below, is a duly authorized representative, and hereby certifies that all information submitted in this and all attached documents is complete and accurate, that all known or suspected hazards have been disclosed, and that this material is considered non-hazardous according to U.S. EPA and Michigan DNR regulations.

James D. Sullivan Chairman 3-19-91
 Generator's Authorized Signature Title Date



CERTIFICATE OF ANALYSIS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 Fax

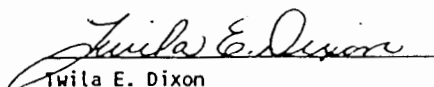
Compliance Services
Recycling Sciences International, Inc.
151 S. Warner Rd.
Wayne, PA 19087

Report No. : 902389
Sample Date: 09/17/90 at 13:30
Sampled By : CSM
Received : 09/18/90
Reported : 10/01/90
P.O. Number: 1830

RMC Number : 6568
Sample Description: RSI-S1 TREATED SAND

Repl	Parameter	Result	Date Anl Completed	Ana-lyst	Method
1	ARSENIC, TOTAL (TCLP)	<0.002 MG/L	09/25/90	JNO	EPA 7060
1	BARIUM, TOTAL (TCLP)	0.9 MG/L	09/25/90	LMS	EPA 7080
1	CADMIUM, TOTAL (TCLP)	<0.05 MG/L	09/21/90	BAK	EPA 7131
1	CHROMIUM, TOTAL (TCLP)	<0.05 MG/L	09/20/90	JNO	EPA 7191
1	LEAD, TOTAL (TCLP)	<0.1 MG/L	09/21/90	LMS	EPA 7421
1	MERCURY, TOTAL (TCLP)	<0.0002 MG/L	09/26/90	LMS	EPA 7470,7471
1	SELENIUM, TOTAL (TCLP)	<0.002 MG/L	09/25/90	BAK	EPA 7740
1	SILVER, TOTAL (TCLP)	<0.05 MG/L	09/20/90	JNO	EPA 7760
1	P.P.L. VOLATILES (SOLID)	SEE VOL. ATTACHMENT	09/25/90	DAF	EPA 8240
1	TCLP VOLATILES (TCLP LEACH)	SEE VOL. ATTACHMENT	09/24/90	DAF	EPA 8240
1	PH (SOLID)	6.73 STANDARD	09/19/90	LAC	EPA 9045
1	IGNITABILITY (SOLID)	NOT IGNITABLE	09/21/90	CM	ASTM D-4982-89A
1	REACTIVITY	NOT REACTIVE	09/26/90	CM	SW846, SEC 7.3
1	TCLP SETUP - NON-VOLATILES	COMPLETED	09/20/90	WSP	EPA 1311
1	TCLP SETUP - VOLATILES	COMPLETED	09/20/90	JEC	EPA 1311

Approved By:


Twila E. Dixon

Assistant Laboratory Manager



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

RMC Environmental Chemistry Laboratory
Volatile Organic Analysis Data

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 FAX

CLIENT I.D. : RSI-S1 TREATED SAND
RMC I.D. : 6568

Date Analyzed : 09/25/90
Analyzed By : DAF

COMPOUND	UG/KG	CRQL	COMPOUND	UG/KG	CRQL
Chloromethane	U	50	cis-1,3-Dichloropropene	U	25
Bromomethane	U	50	Trichloroethene	U	25
Vinyl Chloride	U	50	Benzene	U	25
Chloroethane	U	50	Dibromochloromethane	U	25
Methylene Chloride	6 JB	25	1,1,2-Trichloroethane	U	25
Trichlorofluoromethane	U	25	trans-1,3-Dichloropropene	U	25
1,1-Dichloroethene	U	25	2-Chloroethylvinyl ether	U	50
1,1-Dichloroethane	U	25	Bromoform	U	25
1,2-Dichloroethene (total)	U	25	Tetrachloroethene	U	25
Chloroform	U	25	1,1,2,2-Tetrachloroethane	U	25
1,2-Dichloroethane	U	25	Toluene	U	25
2-Butanone	U	50	Chlorobenzene	U	25
1,1,1-Trichloroethane	U	25	Ethylbenzene	U	25
Carbon Tetrachloride	U	25	1,3-Dichlorobenzene	U	25
Bromodichloromethane	U	25	1,2 & 1,4-Dichlorobenzene	U	25
1,2-Dichloropropane	U	25			

<u>SURROGATE COMPOUNDS</u>	<u>RECOVERY</u>
1,2-Dichloroethane-d4	<u>105 %</u>
Toluene-d8	<u>107 %</u>
Bromofluorobenzene	<u>97 %</u>

CRQL = Contract Required Quantitation Limit

Qualifiers

- (J) Indicates detected below CRQL
- (U) Indicates compound not detected
- (D) Indicates surrogates have been diluted out
- (B) Indicates compound found in blank

Percent Solid of 100. is used for all Target compounds.

Approved By

Laine Kardos



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215-327-4850
215-327-4852 FAX

RMC Environmental Chemistry Laboratory
Volatile Organic Analysis Data

CLIENT I.D. : RSI-S1 TREATED SAND
RMC I.D. : 6568 TCLP

Date Analyzed : 09/24/90
Analyzed By : DAF

COMPOUND	UG/L	CRQL	COMPOUND	UG/L	CRQL
Vinyl Chloride	U	100	Trichloroethene	U	50
1,1-Dichloroethene	U	50	Benzene	U	50
Chloroform	U	50	Tetrachloroethene	U	50
1,2-Dichloroethane	U	50	Chlorobenzene	U	50
2-Butanone	U	100	1,2 & 1,4-Dichlorobenzene	U	50
Carbon Tetrachloride	U	50			

<u>SURROGATE COMPOUNDS</u>	<u>RECOVERY</u>
1,2-Dichloroethane-d4	<u>114 %</u>
Toluene-d8	<u>105 %</u>
Bromofluorobenzene	<u>105 %</u>

CRQL = Contract Required Quantitation Limit

Qualifiers

- (J) Indicates detected below CRQL
- (U) Indicates compound not detected
- (D) Indicates surrogates have been diluted out
- (B) Indicates compound found in blank

Approved By

Laine Kaschke



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 Fax

RMC Environmental Chemistry Laboratory
Volatile Organic Analysis Data

CLIENT I.D. : >B3314 METHOD BLANK
RMC I.D. : METHOD BLANK

Date Analyzed : 09/24/90
Analyzed By : DAF

COMPOUND	UG/L	CRQL	COMPOUND	UG/L	CRQL
Vinyl Chloride	U	10	Trichloroethene	U	5
1,1-Dichloroethene	U	5	Benzene	U	5
Chloroform	U	5	Tetrachloroethene	U	5
1,2-Dichloroethane	U	5	Chlorobenzene	U	5
2-Butanone	U	10	1,2 & 1,4-Dichlorobenzene	U	5
Carbon Tetrachloride	U	5			

SURROGATE COMPOUNDS	RECOVERY
1,2-Dichloroethane-d4	98 %
Toluene-d8	98 %
Bromofluorobenzene	101 %

CRQL = Contract Required Quantitation Limit

Qualifiers

- (J) Indicates detected below CRQL
- (U) Indicates compound not detected
- (D) Indicates surrogates have been diluted out
- (B) Indicates compound found in blank

Approved By

Laine Kardus

DATE: 04/12/91

DATE RECEIVED: 04/09/91
DATE COMPLETED: 04/12/91

CUSTOMER: COMPLIANCE SERVICE
ADDRESS: P.O. BOX 512
CITY, ST., ZIP: SOUTHEASTERN, PA 19399

ATTN: MR. ANDY MEADOWS
PHONE NUMBER: (215) 242-0842
FAX NUMBER: 254-9087

SAMPLE IDENTIFICATION: RECYCLING SCIENCES - SAND W/GAS

DESCRIPTION: BROWN POWDER

SAMPLE NUMBER: 3338

SAMPLE WAS ANALYZED: "AS RECEIVED"

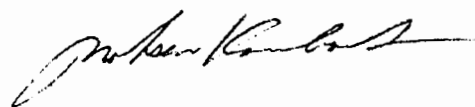
TYPE OF ANALYSIS: TOTAL COPPER & ZINC

DATA: METHODS ARE FOUND IN EPA SW-846 A-C

METALS:	(ppm)	(ppm)
COPPER (7210)	15.2	100 DNR

ZINC (7950)	59.1	500 DNR

REVIEWED BY: MOHSEN KAMBOD
REVIEWED BY: REID GONIWIECHA





CHAIN OF CUSTODY RECORD

P.O. # 1838

Page 2 of 2

Client Name & Address
Recycling Sciences International, Inc. 210 E. 10th 10th St. Marcus Hook, PA 19061
Project Description
Ground Sampling of Site
Sampler (Signature)
<i>Cf. Hunt</i>

ANALYSIS REQUIRED									
PCB'S	PH	REACTIVITY	TCLP METALS	VOC (8010/8020 + MEK)					
X	X	X	X	X					

PRESERVATION REQUIRED
4°C

Sample Station #	Sample Identification	Date	Time	PCB'S	PH	REACTIVITY	TCLP METALS	VOC (8010/8020 + MEK)	COMMENTS
500 RSI-G1 ✓	Site ground Sample 3	9/17/90	2:00 pm	X	X	X	X		
501 RSI-G2 ✓	"	"	"	X	X	X	X		
502 RSI-G3 ✓	"	"	"	X	X	X	X		
503 RSI-G4 ✓	"	"	"	X	X	X	X		
504 RSI-G5 ✓	"	"	"	X	X	X	X		
505 RSI-W1 ✓	Dirty water from Recycling WWV	"	"		X	X	X		
506 RSI-B1 ✓	Ground Samples from buildings	"	"	X	X	X	X		
507 RSI-B2 ✓	"	"	"	X	X	X	X		

EMPTIES DISPATCHED	DATE	TIME	RECEIVED BY	RELINQUISHED BY	DATE	TIME	RECEIVED BY
6	9/17/90	10:00 AM	<i>Cf. Hunt</i>	<i>Cf. Hunt</i>	9/17/90		
RELINQUISHED BY	DATE	TIME	RECEIVED BY	RELINQUISHED BY	DATE	TIME	RECEIVED BY
				<i>William S. [Signature]</i>	9/18/90	830	D. Maycon
RELINQUISHED BY	DATE	TIME	RECEIVED BY	RELINQUISHED BY	DATE	TIME	RECEIVED FOR LABORATORY BY

I certify that the samples taken for analysis are representative of the materials and have been taken by methods described in SW-846, or 40 CFR 261-Appendix I, or by an equivalent method.

Cf. Hunt
Signature

CSI
Company

9/17/90
Date

Witness

Company

Date

CHAIN OF CUSTODY RECORD

P.O.#1830

Page 1 of 2

151 S. WARNER RD.
WAYNE, PA 19087
(215) 254-0842

Client Name & Address <i>Recycling Sciences International, Inc. 210 E. 10th ST. Marcus Hook, PA 19061</i>	ANALYSIS REQUIRED <i>TCLP VOLATILES VOA (8010/8020 + MEK) TCLP METALS PH, REACTIVITY CONTAMINANTS</i>	PRESERVATION REQUIRED <i>4°C</i>
Project Description <i>Decontamination of SANDS</i>		
Sampler (Signature) <i>Cf. Must</i>		

Sample/Station #	Sample Identification	Date	Time	COMMENTS
15 RSI-S1	TREATED SAND WS	9/17/90	1:30 PM	✓
16 RSI-F1	Fines from Scrubber WS	"	"	✓
17 E1	SCRUBBER	9/17/90	2:15 PM	✓
18 E2	WASHER	9/17/90	2:15 PM	✓
				Hydrocarbons driven off by heat
				Sand Fines removed from
				Scrubber System.
				SAME AS WH ON PAGE 2
				COMPOSITE + USE FOR
				ADDITIONAL ANALYSIS
				IF NECESSARY

EMPTIES DISPATCHED	DATE	TIME	RECEIVED BY	RELINQUISHED BY	DATE	TIME	RECEIVED BY
2	9/17/90	10:00 AM	<i>Cf. Must</i>	<i>Cf. Must</i>	9/17/90		
RELINQUISHED BY	DATE	TIME	RECEIVED BY	RELINQUISHED BY	DATE	TIME	RECEIVED BY
				<i>Decontamination</i>	9/18/90	8:30	<i>D. Mayson</i>
RELINQUISHED BY	DATE	TIME	RECEIVED BY	RELINQUISHED BY	DATE	TIME	RECEIVED FOR LABORATORY BY

I certify that the samples taken for analysis are representative of the materials and have been taken by methods described in SW-846, or 40 CFR 261-Appendix I, or by an equivalent method.

Cf. Must
Signature

CSI
Company

9/17/90
Date

Witness

Company

Date

Barb/sharon



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 27 1991

OFFICE OF
SOLID WASTE AND EMERGENCY RESPON

Mr. George Sullivan
Chairman, Recycling Sciences
International, Inc.
30 South Wacker Drive
Suite 1420
Chicago, Illinois 60606

Dear Mr. Sullivan:

This letter responds to the inquiry made by you and your company's legal counsel whether several hazardous waste treatment facilities that employ a single mobile treatment unit may qualify for interim status. Your firm, Recycling Sciences International, Inc. (RSI) owns several waste storage and treatment facilities at different locations, but employs only one mobile treatment unit among these various facilities, transporting the treatment unit from one facility to another. You also indicated that RSI's mobile treatment unit accepts only organic-contaminated soils that are newly regulated as hazardous waste under the revised toxicity characteristic (TC) rule (55 FR 11798, March 29, 1990), and that RSI has applied for interim status to EPA for facilities in Arizona, Pennsylvania, Michigan, and Mississippi.

As you are aware, the TC rule was promulgated by EPA under the authority of the Hazardous and Solid Waste Amendments (HSWA) and therefore is implemented by EPA in all states (until the states become authorized for the TC rule). I have addressed your specific questions below:

1. How does a facility qualify for interim status under the TC rule?

There are three basic prerequisites for obtaining interim status pursuant to § 3005 of RCRA:

- (a) The facility must be in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit (§ 270.70(a));
- (b) The facility must have complied with the notification requirements of § 3010(a) of RCRA (§ 270.70(a)(1)); and

- (c) The facility must comply with the requirements in 40 CFR 270.10 for the submission of the Part A permit application (§ 270.70(a)(2)).

A facility must meet all of the above criteria to qualify for interim status. Note that for a facility to be "in existence", it may either be in operation or under construction. See § 270.2 for the definition of "existing hazardous waste facility".

2. Can a mobile treatment unit qualify for interim status at each facility where it is operated?

Yes, a single MTU may qualify for interim status at more than one location. At each site the MTU must meet the three interim status criteria described in question one above. The fact that the treatment unit is a mobile unit instead of a stationary unit does not diminish the opportunity to gain interim status. After the effective date of the TC rule (September 25, 1990), the unit must meet all applicable interim status standards.

3. Does routine movement of the MTU from site to site constitute a change in interim status that has to be approved by EPA?

No, such movement is not a change in interim status under Federal regulations as long as the unit is always operated within the constraints identified on the Part A permit application (e.g., the types and quantities of hazardous waste, and the unit process types and design capacity). Simply moving the unit to or from the site does not in itself constitute a change in interim status. However, any change to the unit or to the operation that results in an "increase in design capacity", a "change in process", or an "addition of process" would require a revised Part A and prior approval by EPA before the change could be implemented (see § 270.72(a)).

4. If a facility in an authorized state obtains interim status for TC wastes from EPA, can the company amend interim status without prior approval to treat and store hazardous waste not previously identified in the Part A?

An interim status facility located in an authorized state but regulated by EPA because of the TC rule can apply to EPA for additional TC waste codes not on the original Part A and other HSWA waste codes that the State is not authorized for. The addition of a new, non-HSWA waste code would be subject to regulation by the authorized State and not by EPA. Note that if the State has not yet adopted the TC rule and a facility with Federal interim status due only to TC wastes wants to make changes to add non-HSWA wastes regulated under the authorized

State program, this may be viewed by the state as a "new" hazardous waste operation since the facility would not have interim status under State law. In this case, the State might require a RCRA permit prior to receipt of the wastes.

If you have any questions, please contact me (202-382-2223) or Wayne Roepe of my staff (202-475-7245).

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank McAlister".

Frank McAlister
Acting Chief, Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Anthony Novelli
Recycling Sciences Center
210 East Tenth Street
Marcus Hook, PA 19061

25 1991

RE: Recycling Sciences Center (PAD 987 283 439)

Dear Mr. Novelli:

This is to acknowledge that the Environmental Protection Agency (EPA) has received your revised Part A of a Hazardous Waste Application for the facility identified below. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 C.F.R. Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

I. Facility name, location, and EPA Identification Number.

Name: Recycling Sciences Center

Location: 210 East Tenth Street
Marcus Hook, PA 19061

ID. Number: PAD 987 283 439

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 C.F.R. Parts 265 and 270.

Owner's Name: Recycling Sciences International, Inc.

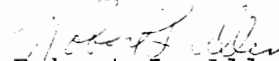
Operator's Name: Recycling Sciences International, Inc.

III. During the period of interim status, the facility may use only the following processes for treating, storing, or disposing of the following new TC wastes, up to the design capacities that are indicated.

<u>Process</u>	<u>Design Capacity</u>	<u>WasteCode</u>
T04, S01, S03	4,712 Tons	D018
T04, S01, S03	4,712 Tons	D019
T04, S01, S03	4,712 Tons	D020
T04, S01, S03	4,712 Tons	D021
T04, S01, S03	4,712 Tons	D022
T04, S01, S03	4,712 Tons	D023
T04, S01, S03	4,712 Tons	D024
T04, S01, S03	4,712 Tons	D025
T04, S01, S03	4,712 Tons	D026
T04, S01, S03	4,712 Tons	D027
T04, S01, S03	4,712 Tons	D028
T04, S01, S03	4,712 Tons	D029
T04, S01, S03	4,712 Tons	D030
T04, S01, S03	4,712 Tons	D031
T04, S01, S03	4,712 Tons	D032
T04, S01, S03	4,712 Tons	D033
T04, S01, S03	4,712 Tons	D034
T04, S01, S03	4,712 Tons	D035
T04, S01, S03	4,712 Tons	D036
T04, S01, S03	4,712 Tons	D037
T04, S01, S03	4,712 Tons	D038
T04, S01, S03	4,712 Tons	D039
T04, S01, S03	4,712 Tons	D040
T04, S01, S03	4,712 Tons	D041

Should you have any questions or comments, please do not
hesitate to call Barbara Okorn of my staff at (215) 597-8116.

Sincerely,


Robert L. Allen, Chief
RCRA Programs Branch

cc: Lawrence H. Lunsik
PADER (Norristown Regional Office)

Barbara Okorn (3HW51)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

FEB 22 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Anthony Novelli
Recycling Sciences Center
210 East Tenth Street
Marcus Hook, PA 19061

RE: Recycling Sciences Center (PAD 987 283 439)

Dear Mr. Novelli:

This is to acknowledge that the Environmental Protection Agency (EPA) has received your revised Part A of a Hazardous Waste Application for the facility identified below. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 C.F.R. Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

I. Facility name, location, and EPA Identification Number.

Name: Recycling Sciences Center

Location: 210 East Tenth Street
Marcus Hook, PA 19061

ID. Number: PAD 987 283 439

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 C.F.R. Parts 265 and 270.

Owner's Name: Recycling Sciences International, Inc.

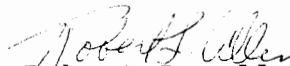
Operator's Name: Recycling Sciences International, Inc.

III. During the period of interim status, the facility may use only the following processes for treating, storing, or disposing of the following new TC wastes, up to the design capacities that are indicated.

<u>Process</u>	<u>Design Capacity</u>	<u>WasteCode</u>
T04, S01, S03	4,712 Tons	D018
T04, S01, S03	4,712 Tons	D019
T04, S01, S03	4,712 Tons	D020
T04, S01, S03	4,712 Tons	D021
T04, S01, S03	4,712 Tons	D022
T04, S01, S03	4,712 Tons	D023
T04, S01, S03	4,712 Tons	D024
T04, S01, S03	4,712 Tons	D025
T04, S01, S03	4,712 Tons	D026
T04, S01, S03	4,712 Tons	D027
T04, S01, S03	4,712 Tons	D028
T04, S01, S03	4,712 Tons	D029
T04, S01, S03	4,712 Tons	D030
T04, S01, S03	4,712 Tons	D031
T04, S01, S03	4,712 Tons	D032
T04, S01, S03	4,712 Tons	D033
T04, S01, S03	4,712 Tons	D034
T04, S01, S03	4,712 Tons	D035
T04, S01, S03	4,712 Tons	D036
T04, S01, S03	4,712 Tons	D037
T04, S01, S03	4,712 Tons	D038
T04, S01, S03	4,712 Tons	D039
T04, S01, S03	4,712 Tons	D040
T04, S01, S03	4,712 Tons	D041

Should you have any questions or comments, please do not
hesitate to call Barbara Okorn of my staff at (215) 597-8116.

Sincerely,


Robert L. Allen, Chief
RCRA Programs Branch

cc: Lawrence H. Lunsik
PADER (Norristown Regional Office)

Barbara Okorn (3HW51)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION III
841 CHESTNUT BUILDING
PHILADELPHIA, PA. 19107

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE \$300



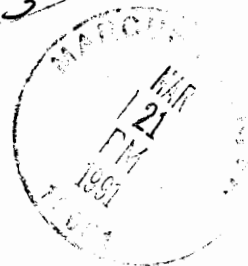
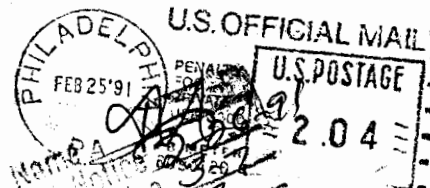
REASON CHECKED
☒ Unclaimed ☐ Refused
☐ Attempted-Not Known
☐ Insufficient Address
☐ No such street number
☐ No such office in state
Do not remail in this envelope

MR. ANTHONY NOVELLI
RECYCLING SCIENCES CENTER
210 EAST 10TH STREET
MARCUS HOOK, PA. 19061

CERTIFIED

P 097 470 499

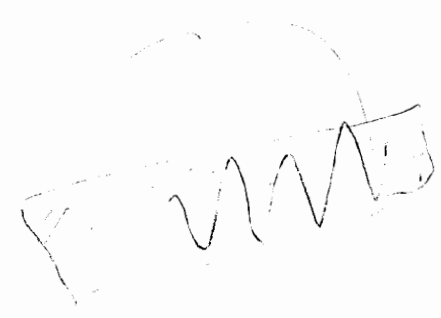
MAIL



NOTIFIED
2-26-91
JH

3 HW 51

recycling
sciences
center
AS
494-6822

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE	
		<input type="checkbox"/> OTHER (SPECIFY) _____	
		<small>(Record of item checked above)</small>	
TO: <div style="font-size: 1.2em; font-family: cursive;">File</div>	FROM: <div style="font-size: 1.2em; font-family: cursive;">Luis Pizarro (3HW51)</div>	DATE <div style="font-size: 1.2em; font-family: cursive;">10/1/90</div>	TIME <div style="font-size: 1.2em; font-family: cursive;">11:30</div>
SUBJECT <div style="font-size: 1.2em; font-family: cursive;">Recycling Sciences International (RSI) Closure plan</div>			
SUMMARY OF COMMUNICATION <div style="font-size: 1.5em; font-family: cursive;"> <p>1 As per Anthony Novelli the attached copy of RSI closure plan is for EPA information only.</p> </div> <div style="text-align: right; font-size: 2em; font-family: cursive; margin-top: 100px;">  </div>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			

For EPA Regional
Use Only



10/30 ✓

For State
Use Only

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application

Part A

STATUS UNKNOWN

(Read the Instructions before starting)

Date Received
Month Day Year
10 26 90

I. ID Number(s)

A. EPA ID Number

B. Secondary ID Number (if applicable)

PAD987283439

II. Name of Facility

RECYCLING SCIENCES CENTER

III. Facility Location (Physical address not P.O. Box or Route Number)

A. Street

210 E 10TH ST

Street (continued)

City or Town

State

ZIP Code

MARCUS HOOK

PA 19061

County Code
(if known)

County Name

DELAWARE

B. Land Type

C. Geographic Location

D. Facility Existence Date

(order code)

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

Month Day Year

P 39 49 10 N 75 24 36 W

09 25 19

IV. Facility Mailing Address

Street or P.O. Box

210 E 10TH ST

City or Town

State

ZIP Code

MARCUS HOOK

PA 19061

V. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (last)

(first)

NOVELLI

ANTHONY

Job Title

Phone Number (area code and number)

DIR COMPLIANCE

312-559-0122

VI. Facility Contact Address (See Instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

30 S WACKER DR

City or Town

State

ZIP Code

CHICAGO

IL 60606

EPA I.D. Number (enter from page 1)

PAD987283439

Secondary ID Number (enter from page 1)

VII. Operator Information (see Instructions)

Name of Operator

RECYCLING SCIENCES INT'L INC

Street or P.O. Box

305 SWACKER DR SUITE 1420

City or Town

CHICAGO

State

ZIP Code

IL

60606-

Phone Number (area code and number)

312-559-0122

B. Operator Type

P

C. Change of Operator Indicator

Yes

No

Date Change

Month

Day

VIII. Facility Owner (see Instructions)

A. Name of Facility's Legal Owner

SEE ATTACHMENT A

Street or P.O. Box

City or Town

State

ZIP Code

Phone Number (area code and number)

312-559-0122

B. Owner Type

P

C. Change of Owner Indicator

Yes

No

Date Change

Month

Day

IX. SIC Codes (4-digit, in order of significance)

Primary

4953

(description)

REFUSE SYSTEM

Secondary

(description)

Secondary

(description)

Secondary

(description)

X. Other Environmental Permits (see Instructions)

A. Permit Type (enter code)

E

B. Permit Number

C. Description

STATE AIR EMISSIONS PERMIT FILE
(NOT YET RECEIVED)

EPA I.D. Number (enter from page 1)

PAD987283439

Secondary ID Number (enter from page 1)

XI. Nature of Business (provide a brief description)

SOLID TOXIC, AND HAZARDOUS
WASTE TREATMENT AND STORAGE

XII. Process - Codes and Design Capacities

A. **PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the site. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its capacity) in the space provided in Item XIII.

B. **PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.

1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure enforcement action) enter the total amount of waste for that process unit.
2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. **PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE
D79	<u>DISPOSAL:</u> INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS
D80	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER HOUR
D81	LAND APPLICATION	ACRES OR HECTARES	GALLONS PER DAY
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER HOUR
S01	<u>STORAGE:</u> CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS	LITERS PER DAY
S02	TANK	GALLONS OR LITERS	SHORT TONS PER HOUR
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS	METRIC TONS PER HOUR ...
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS	SHORT TONS PER DAY
T01	<u>TREATMENT:</u> TANK	GALLONS PER DAY OR LITERS PER DAY	METRIC TONS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUR
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR	KILOGRAMS PER HOUR ...
T04	OTHER TREATMENT <small>(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in Item XIII.)</small>	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY	CUBIC YARDS
			CUBIC METERS
			ACRES
			ACRE-FEET
			HECTARES
			HECTARE-METER
			BTU's PER HOUR

EPA I.D. Number (enter from page 1)

Secondary ID Number (enter from page 1)

PAD987283439

XII. Process - Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an Incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)			B. PROCESS DESIGN CAPACITY		C. PROCESS TOTAL NUMBER OF UNITS	FOR OFFICIAL USE ONLY					
				1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)							
X 1	5	0	2	600	G	0	0	2				
X 2	T	0	3	20	E	0	0	1				
0 1	S	0	1	37 700	Y	*						
0 2	S	0	1	215 985 ✓	G	*	*					
0 3	S	0	3	42 890 ✓	Y	0	0	2				
4												
5												
6												
7												
8												
9												
1 0												
1 1												
1 2												

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in XIII.

XIII. Additional Treatment Processes (follow instructions from Item XII)

Line Number (enter numbers in sequence with Item XII)	A. PROCESS CODE	B. TREATMENT PROCESS DESIGN CAPACITY		C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)		
0 4	T 0 4	19	D ✓	0 0 1	RSI's DAVES - LOW TEMPERATURE DESORPTION AND VAPOR EXTRACTION SYSTEM. SEE ATTACHMENT B
	T 0 4				
	T 0 4				
	T 0 4				

EPA I.D. Number (enter from page 1)									Secondary ID Number (enter from page 1)										
P	A	D	9	8	7	2	8	3	4	3	9								

XIV. Description of Hazardous Wastes

- A. EPA HAZARDOUS WASTE NUMBER** - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from I list of process codes contained in item XI A on page 3 to indicate all the processes that will be used to store, treat, and dispose of all the non-listed hazardous wastes that processes that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of item XIV-D(1).
3. Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).

2. **PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided the form (D.2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER- Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste in column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be by incinerator and disposal will be in a landfill.

A. EPA HAZARD WASTE NO. (enter code)						B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS									
Line Number								(1) PROCESS CODES (enter)						(2) PROCESS DESCRIPTION (If a code is not entered here)			
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
K	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

Secondary ID Number (enter from page 1)

[illegible]

SECRET

[illegible]

EPA I.D. Number (enter from page 1)

Secondary ID Number (enter from page 1)

P A D 9 8 7 2 8 3 4 3 9

XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line
Number

Additional Process Codes (enter)

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in and all attached documents, and that based on my inquiry of those individuals immediately responsible obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine imprisonment.

Owner Signature

Mark Durbett

Date Signed

9/22/90

Name and Official Title (type or print)

MARK BURCHETT EXECUTIVE VICE-PRESIDENT

Operator Signature

Date Signed

Name and Official Title (type or print)

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

ATTACHMENT A

Property owner: The Marcus Hook Corporation
c/o Kevin J. Silverang Atty.
1709 Rittenhouse Square
Philadelphia, PA 19103

Facility Owner: Recycling Sciences International, Inc.
30 South Wacker Drive
Suite 1420
Chicago, Illinois 60606
(312) 559-0122

Use Only

EPA

Use Only

United States Environmental Protection Agency
Washington, DC 20460Hazardous Waste Permit
Application
Part A

SEP 25 1990

(Read the Instructions before starting)

Date Received

Month Day Year

I. ID Number(a)

A. EPA ID Number

B. Secondary ID Number (if applicable)

PAD987283439

II. Name of Facility

RECYCLING SCIENCES CENTER

III. Facility Location (Physical address not P.O. Box or Route Number)

A. Street

210 E 10TH ST

Street (continued)

City or Town

MARCUS HOOK

State

ZIP Code

PA 19061-

County Code
(if known)

County Name

DELAWARE

B. Land Type

C. Geographic Location

D. Facility Existence Date

(order code)

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

P

39 49 10 N

75

24 36 W

Month Day Year

09 25 1990

IV. Facility Mailing Address

Street or P.O. Box

210 E 10TH ST

City or Town

MARCUS HOOK

State

ZIP Code

PA 19061-

V. Facility Contact (Person to be contacted regarding waste activities at facility)

Name (last)

(first)

NOVELLI

ANTHONY

Job Title

Phone Number (area code and number)

DIR COMPLIANCE

312-559-0122

VI. Facility Contact Address (See Instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

30

S

WACKER DR

SUITE

1420

City or Town

CHICAGO

State

ZIP Code

IL 60606-

EPA I.D. Number (enter from page 1)

Secondary ID Number (enter from page 2)

PAD987283439

VII. Operator Information (see instructions)

Name of Operator

RECYCLING SCIENCES INT'L INC

Street or P.O. Box

30 SWACKER DR SUITE 1420

City or Town

CHICAGO

State

ZIP Code

IL 60606 -

Phone Number (area code and number)

312-559-0122

B. Operator Type

P

C. Change of Operator Indicator

Yes

No

Date Change

Month

Day

VIII. Facility Owner (see instructions)

A. Name of Facility's Legal Owner

SEE ATTACHMENT A

Street or P.O. Box

City or Town

State

ZIP Code

Phone Number (area code and number)

312-559-0122

B. Owner Type

P

C. Change of Owner Indicator

Yes

No

Date Change

Month

Day

IX. SIC Codes (4-digit, in order of significance)

Primary

4953

(description)

REFUSE SYSTEM

Secondary

(description)

Secondary

(description)

Secondary

(description)

X. Other Environmental Permits (see instructions)

A. Permit Type
(enter code)

E

B. Permit Number

C. Description

STATE AIR EMISSIONS PERMIT FILE
(NOT YET RECEIVED)

EPA I.D. Number (enter from page 1)

PAD987283439

Secondary ID Number (enter from page 1)

XI. Nature of Business (provide a brief description)

SOLID TOXIC, AND HAZARDOUS
WASTE TREATMENT AND STORAGE

XII. Process - Codes and Design Capacities

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Twelve lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided in Item XIII.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

- 1. AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure enforcement action) enter the total amount of waste for that process unit.
- 2. UNIT OF MEASURE** - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units used with the corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	UNIT OF MEASURE
D79	<u>DISPOSAL:</u> INJECTION WELL	GALLONS; LITERS; GALLONS PER DAY; OR LITERS PER DAY	GALLONS
D80	LANDFILL	ACRE-FEET OR HECTARE-METER	GALLONS PER HOUR
D81	LAND APPLICATION	ACRES OR HECTARES	GALLONS PER DAY
D82	OCEAN DISPOSAL	GALLONS PER DAY OR LITERS PER DAY	LITERS
D83	SURFACE IMPOUNDMENT	GALLONS OR LITERS	LITERS PER HOUR
S01	<u>STORAGE:</u> CONTAINER (barrel, drum, etc.)	GALLONS OR LITERS	LITERS PER DAY
S02	TANK	GALLONS OR LITERS	SHORT TONS PER HOUR
S03	WASTE PILE	CUBIC YARDS OR CUBIC METERS	METRIC TONS PER HOUR
S04	SURFACE IMPOUNDMENT	GALLONS OR LITERS	SHORT TONS PER DAY
T01	<u>TREATMENT:</u> TANK	GALLONS PER DAY OR LITERS PER DAY	METRIC TONS PER DAY
T02	SURFACE IMPOUNDMENT	GALLONS PER DAY OR LITERS PER DAY	POUNDS PER HOUR
T03	INCINERATOR	SHORT TONS PER HOUR; METRIC TONS PER HOUR; GALLONS PER HOUR; LITERS PER HOUR; OR BTU'S PER HOUR	KILOGRAMS PER HOUR
T04	OTHER TREATMENT <small>(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundment or incinerators. Describe the processes in the space provided in Item XIII.)</small>	GALLONS PER DAY; LITERS PER DAY; POUNDS PER HOUR; SHORT TONS PER HOUR; KILOGRAMS PER HOUR; METRIC TONS PER DAY; METRIC TONS PER HOUR; OR SHORT TONS PER DAY	CUBIC YARDS
			CUBIC METERS
			ACRES
			ACRE-FEET
			HECTARES
			HECTARE-METER
			BTU'S PER HOUR

PAD987283439

Secondary ID Number (enter from page 1)

XII. Process - Codes and Design Capacities (continued)

EXAMPLE FOR COMPLETING ITEM XII (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank hold 200 gallons and the other can hold 400 gallons. The facility also has an Incinerator that can burn up to 20 gallons per hour.

Line Number	A. PROCESS CODE (from list above)				B. PROCESS DESIGN CAPACITY		C. PROCESS TOTAL NUMBER OF UNITS			FOR OFFICIAL USE ONLY			
					1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)							
X 1	S	0	2		600	G	0	0	2				
X 2	T	0	3		20	E	0	0	1				
0 1	S	0	1		37 700	Y	*						
0 2	S	0	1		215 985	G	*	*					
0 3	S	0	3		42 890	Y	0	0	2				
4													
5													
6													
7													
8													
9													
1 0													
1 1													
1 2													

NOTE: If you need to list more than 12 process codes, attach an additional sheet(s) with the information in the same format above. Number the lines sequentially, taking into account any lines that will be used for additional treatment processes in XIII.

XIII. Additional Treatment Processes (follow instructions from Item XI)

Line Number (enter numbers in sequence with Item XII)	A. PROCESS CODE			B. TREATMENT PROCESS DESIGN CAPACITY		C. PROCESS TOTAL NUMBER OF UNITS	D. DESCRIPTION OF PROCESS
				1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)		
0 4	T	0	4	19	D	0 0 1	RSI's DAVES - LOW TEMPERATURE DESORPTION AND VAPOR EXTRACTION SYSTEM. SEE ATTACHMENT B
	T	0	4				
	T	0	4				
	T	0	4				

PAD987283439

XIV. Description of Hazardous Wastes

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item XII A, on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item XII A, on page 3 to indicate all the processes that will be used to store, treat, and dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item XIV-D(1).
- Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be by incineration and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS										
							(1) PROCESS CODES (enter)					(2) PROCESS DESCRIPTION (If a code is not entered)					
X 1	K	0	5	4	900	P	T	0	3	D	8	0					
X 2	D	0	0	2	200	P	T	0	3	D	8	0					
X 3	D	0	0	1	100	P	T	0	3	D	8	0					
X 4	D	0	0	2													Included With Above

EPA I.D. Number (enter from page 1)

Secondary ID Number (enter from page 1)

PAD987283439

XIV. Description of Hazardous Wastes (continued)

D. PROCESSES

Line Number	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				(1) PROCESS CODES (enter)	(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
0 1	D 0 1 8	4712	T	T 0 4 S 0 1 S 0 3	
0 2	D 0 1 9	4712	T	T 0 4 S 0 1 S 0 3	
0 3	D 0 2 0	4712	T	T 0 4 S 0 1 S 6 3	
0 4	D 0 2 1	4712	T	T 0 4 S 0 1 S 0 3	
0 5	D 0 2 2	4712	T	T 0 4 S 0 1 S 0 3	
0 6	D 0 2 3	4712	T	T 0 4 S 0 1 S 0 3	
0 7	D 0 2 4	4712	T	T 0 4 S 0 1 S 0 3	
0 8	D 0 2 5	4712	T	T 0 4 S 0 1 S 0 3	
0 9	D 0 2 6	4712	T	T 0 4 S 0 1 S 0 3	
1 0	D 0 2 7	4712	T	T 0 4 S 0 1 S 0 3	
1 1	D 0 2 8	4712	T	T 0 4 S 0 1 S 0 3	
1 2	D 0 2 9	4712	T	T 0 4 S 0 1 S 0 3	
1 3	D 0 3 0	4712	T	T 0 4 S 0 1 S 0 3	
1 4	D 0 3 1	4712	T	T 0 4 S 0 1 S 0 3	
1 5	D 0 3 2	4712	T	T 0 4 S 0 1 S 0 3	
1 6	D 0 3 3	4712	T	T 0 4 S 0 1 S 0 3	
1 7	D 0 3 4	4712	T	T 0 4 S 0 1 S 0 3	
1 8	D 0 3 5	4712	T	T 0 4 S 0 1 S 0 3	
1 9	D 0 3 6	4712	T	T 0 4 S 0 1 S 0 3	
2 0	D 0 3 7	4712	T	T 0 4 S 0 1 S 0 3	
2 1	D 0 3 8	4712	T	T 0 4 S 0 1 S 0 3	
2 2	D 0 3 9	4712	T	T 0 4 S 0 1 S 0 3	
2 3	D 0 4 0	4712	T	T 0 4 S 0 1 S 0 3	
2 4	D 0 4 1	4712	T	T 0 4 S 0 1 S 0 3	
2 5					
2 6					
2 7					
2 8					
2 9					
3 0					
3 1					
3 2					
3 3					

EPA I.D. Number (enter from page 1)

Secondary ID Number (enter from page 1)

PAD987283439

XIV. Description of Hazardous Waste (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 6.

Line
Number

Additional Process Codes (enter)

XV. Map

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in and all attached documents, and that based on my inquiry of those individuals immediately responsible obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine imprisonment.

Owner Signature

Mark Burdett

Date Signed

9/22/90

Name and Official Title (type or print)

MARK BURDETT EXECUTIVE VICE-PRESIDENT

Operator Signature

Date Signed

Name and Official Title (type or print)

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (refer to instructions for more information)

ATTACHMENT A

Property owner: The Marcus Hook Corporation
c/o Kevin J. Silverang Atty.
1709 Rittenhouse Square
Philadelphia, PA 19103

Facility Owner: Recycling Sciences International, Inc.
30 South Wacker Drive
Suite 1420
Chicago, Illinois 60606
(312) 559-0122

Trainer

Sewage
Disposal

Cam

(S03) XII LINE # 03
(S01) XII LINE # 01, 02
(T04) XIII LINE # 01

SEE
FOR

19

IT

FACILITY
DRAWING

TENTH STREET

WALN

AVENUE

EARTH
BERMS

TRUCK
SCALE

TRUCK
DECON

80 mil
HDPE
LINERS

FENCE LINE

LEAK PROOF
SOLIDS CONTAINER
STORAGE

(S01)

(S03)

DRUM
LOADING
SYSTEM
TREATMENT
AREA
(T04)

WATER
ACCUMULATION
AREA

DRUM
STORAGE

(S01)

40 mil HDPE
COVERED
PILE

LEAK PROOF SOLIDS CONTAINER
STORAGE

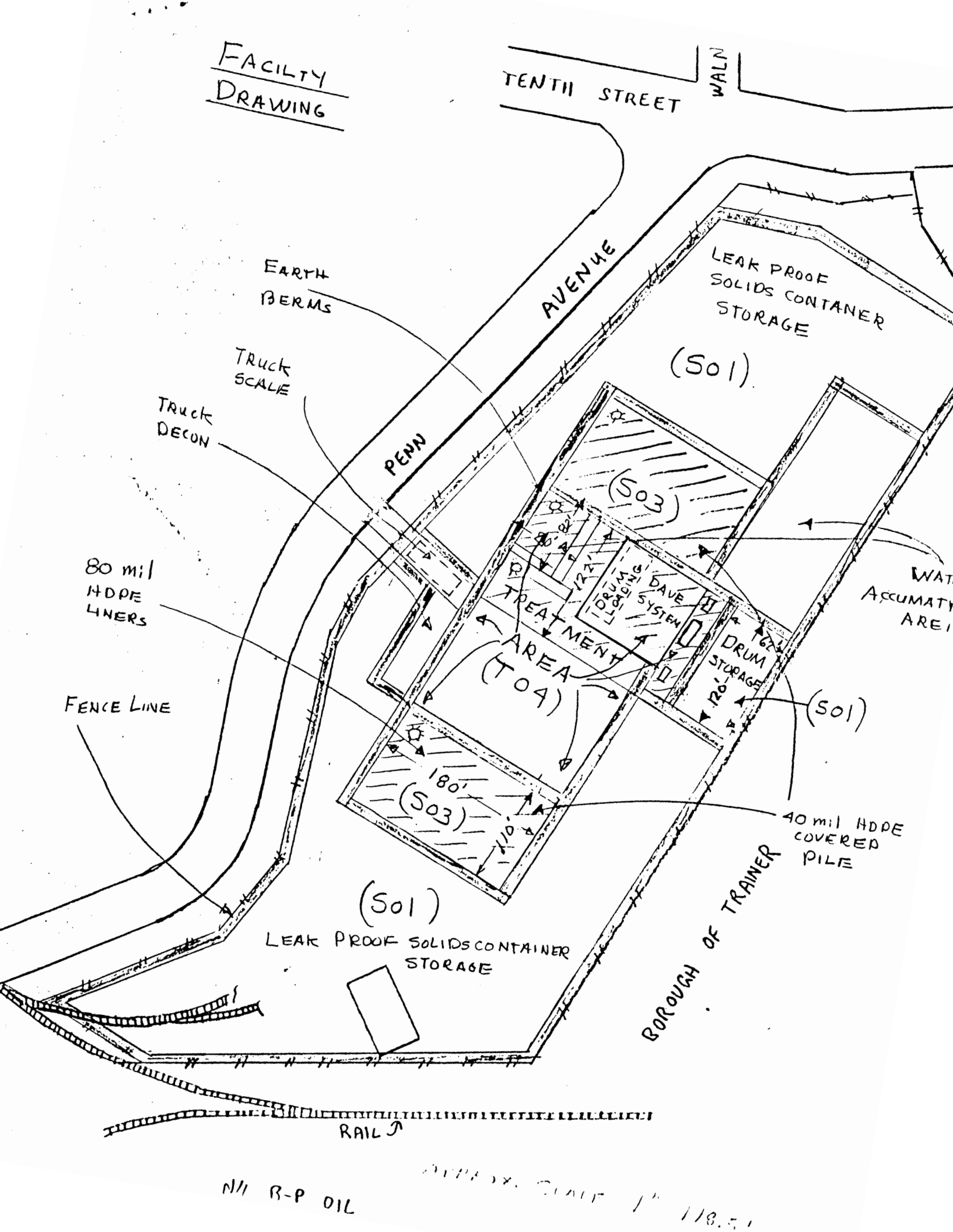
(S01)

BOROUGH OF TRAINER

RAIL

N/1 R-P OIL

APPROX. SCALE 1" = 118.5'





RECYCLING SCIENCES INTERNATIONAL, INC.

An Environmental Restoration Company
30 South Wacker Drive, Suite 1420
Chicago, Illinois 60606
(312) 559-0122

September 24, 1990

US EPA Region III
RCRA Programs Branch (3HW53)
841 Chestnut Street
Philadelphia, PA 19107

Dear Sir or Madam:

Enclosed is our irrevocable standby letter of credit No.S242457. This letter is to notify you of Recycling Sciences International, Inc.'s financial assurance mechanism for closure for the site listed below:

Recycling Sciences Center
210 E. 10th Street
Marcus Hook, PA 19061
ID#PAD987283439

If you have any questions. please feel free to call.

Sincerely,

Anthony Novelli
Director of Compliance Services

AN/Imm
Enclosure

The Northern Trust Company
International Services

P.O. Box 92921
Chicago, Illinois 60675
TELEPHONE: (312) 630-6000
S.W.I.F.T. ADDRESS: CNORUS44

IRREVOCABLE STANDBY LETTER OF CREDIT

US EPA REGION III
RCRA PROGRAMS BRANCH (3HW53)
841 CHESTNUT STREET
PHILADELPHIA, PA 19107

DEAR SIR OR MADAM:

WE HEREBY ESTABLISH OUR IRREVOCABLE STANDBY LETTER OF CREDIT NO. S242457 IN YOUR FAVOR, AT THE REQUEST AND FOR THE ACCOUNT OF RECYCLING SCIENCES INTERNATIONAL, INC. UP TO THE AGGREGATE AMOUNT OF ONE THOUSAND US DOLLAR (\$1000.00), AVAILABLE UPON PRESENTATION OF:

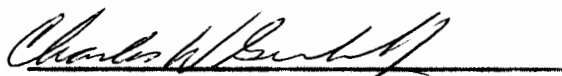
1. YOUR SIGHT DRAFT, BEARING REFERENCE TO THIS LETTER OF CREDIT NO. S242457 AND
2. YOUR SIGNED STATEMENT READING AS FOLLOWS:

"I CERTIFY THAT THE AMOUNT OF THE DRAFT IS PAYABLE PURSUANT TO REGULATIONS ISSUED UNDER AUTHORITY OF THE RESOURCE CONSERVATION AND RECOVERY ACT OF 1976 AS AMENDED."

THIS LETTER OF CREDIT IS EFFECTIVE AS OF SEPTEMBER 24, 1990 AND SHALL EXPIRE ON SEPTEMBER 24, 1991, BUT SUCH EXPIRATION DATE SHALL BE AUTOMATICALLY EXTENDED FOR A PERIOD OF AT LEAST ONE YEAR ON SEPTEMBER 24, 1991 AND ON EACH SUCCESSIVE EXPIRATION DATE, UNLESS, AT LEAST 120 DAYS BEFORE THE CURRENT EXPIRATION DATE, WE NOTIFY BOTH YOU AND RECYCLING SCIENCES INTERNATIONAL INC BY CERTIFIED MAIL THAT WE HAVE DECIDED NOT TO EXTEND THIS LETTER OF CREDIT BEYOND THE CURRENT EXPIRATION DATE. IN THE EVENT YOU ARE SO NOTIFIED, ANY UNUSED PORTION OF THE CREDIT SHALL BE AVAILABLE UPON PRESENTATION OF YOUR SIGHT DRAFT FOR 120 DAYS AFTER THE DATE OF RECEIPT BY BOTH YOU AND RECYCLING SCIENCES INTERNATIONAL, INC., AS SHOWN ON THE SIGNED RETURN RECEIPTS. WHENEVER THIS LETTER OF CREDIT IS DRAWN ON UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS CREDIT, WE SHALL DULY HONOR SUCH DRAFT UPON PRESENTATION TO US, AND WE SHALL DEPOSIT THE AMOUNT OF THE DRAFT DIRECTLY INTO THE STANDBY TRUST FUND OF RECYCLING SCIENCES INTERNATIONAL, INC. IN ACCORDANCE WITH YOUR INSTRUCTIONS.

WE CERTIFY THAT THE WORDING OF THIS LETTER OF CREDIT IS IDENTICAL TO THE WORDING SPECIFIED IN 40 CFR 254.151(D) AS SUCH REGULATIONS WERE CONSTITUTED ON THE DATE SHOWN IMMEDIATELY BELOW.

EXCEPT TO THE EXTENT INCONSISTENT WITH THE EXPRESS TERMS HEREOF, THIS CREDIT IS SUBJECT TO THE UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS, 1983 REVISION, I.C.C. PUBLICATION NO. 400.



AUTHORIZED SIGNATURE(S)
TITLE: OPERATIONS OFFICER
SEPTEMBER 24, 1990